**Section § 393.11: Lamps and reflective devices.**

## Guidance Q&A

**Question 3:** Section 393.11, Footnote 5, requires that each converter dolly be equipped with turn signals at the rear if the converter dolly obscures the turn signals at the rear of the towing vehicle when towed singly by another vehicle. Are turn signals required on the rear of the converter dolly when the towing of the unladen dolly prevents other motorists from seeing only a portion of the lenses of the turn signals on the towing vehicle?

**Guidance:**Yes. Although a portion of the rear turn signal lenses on the towing vehicle may be visible to other drivers, the turn signal generally would not satisfy the visibility requirements of FMVSS No. 108 if the converter dolly prevents other motorists from seeing the entire lens. The visibility requirements of FMVSS No. 108 help to ensure that other drivers can see the turn signal from a range of positions to the rear of the vehicle. Therefore, turn signals on the towing vehicle are considered to be obscured by the converter dolly if other motorists’ view of the lens is even partially blocked.