**From:** Victor Pandolfi <[vpan44@icloud.com](mailto:vpan44@icloud.com)>

**Date:** Wednesday, Jun 07, 2017, 9:23 AM

**To:** Segev, Eran (VOLPE) <[Eran.Segev@dot.gov](mailto:Eran.Segev@dot.gov)>

**Subject:** This Is Victor, we spoke on the phone yesterday.

Dear Mr. Segev, Eran,

My name is Victor Pandolfi.  I spoke to you yesterday, June 6, 2017 in regards to the Meeting: Motor Carrier Safety Advisory Committee; Task 17-3: Regulatory Review; June 12 - 13, 2017.  I will submit my comment for consideration by the committee via fax by the end of today, June 7, 2017.

The Regulation for review is from Title 49: Transportation, Part 393, Subpart H, 393.95 (f)(3) other warning devices.  I would like to the committee to consider LED Road Flares to be included or modified.

Under the current Regulation, an LED Road Flare can be used in addition to but not in lieu of.  This puts American Made LED Road Flare manufactures at a disadvantage with international markets such as those manufactured in China.

Regulation 393.95 (h)(2)(ii)  refers to the reflective light an emergency reflective light must be at least 80% of the a Candlepower of 12.  This regulation dates back to the late 60's.

I recognize not all LED Road Flares are the same, but to give you an example.  An LED Road Flare made by Turboflare International produces 414 Candlepower.

I know the committee takes safety seriously.  The committee might find it pertinent to set minimum luminous flux or candlepower standard.  This is fair and something I encourage.

LED Road Flares are battery operated and unlike burning Fusee's, can be used over and over again.  As a results, LED Road Flares have the potential to save the Federal Government money if chosen.

Fusee's contain Non-perchlorate, a type of salt the dissolves quickly and enters groundwater and surface water easily.  Some states have classified this as "Hazardous Waste".  Other considerations for the environment.  LED Road Flares are not hazardous when disposed of properly.   Unlike burning flares, LED Road Flares can not cause fires.  After record heat breaking months, thats something you cant put a number on.

Mr. Segev, Eran.  That pretty much sums it up.  Thank you for taking to the time to help me.  I am grateful.  I will call you later today,

Victor Pandolfi.

D.O.T.

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Task 17-3: Regulatory Review

Motor Carrier Safety Advisory Committee; Task 17-3: Regulatory Review; [June 12 - 13, 2017](x-apple-data-detectors://0). I submit my comment for consideration by the committee via fax Wed. June 7, 2017. I believe Reg. 393.95 is outdated and hurts manufactures which make LED Road Flares here in the United States of America.

The Regulation for review is from Title 49: Transportation, Part 393, Subpart H, 393.95 (f)(2)(ii)(3) other warning devices.  I would like to the committee to consider LED Road Flares be included in (2) and (ii).

Currently, this Regulation allows LED Road Flare in addition, but not in lieu of. As a result, it is optional nut not required. This puts American Made LED Road Flare manufactures at a disadvantage competing with international markets such as those manufactured in China. LED Road Flares can provide more Candlepower than Orion 3 Fusees' burning simultaneously at 70 Candlepower.

Regulation 393.95 (h)(2)(ii) refers to the reflective light an emergency reflective light must be at least 80% of the a Candlepower of 12. This regulation dates back to the late 60's. I recognize not all LED Road Flares are the same, but to give you an example. According to Turboflare International. An LED Road Flare made by Turboflare International has a luminosity flux at 414 Candlepower. I know the committee takes safety seriously. Another option the Committee may want to consider is setting a luminous flux or candlepower standard.. This is fair and something I encourage.

LED Road Flares are battery operated and unlike burning Fusee's, can be used over and over again. As a results, the potential the Federal Government money has to save with these is real. LED Road Flares can be used without the risk of fire. After record heat breaking months, thats something you cant put a number on. Also in terms of the environment. Fusee's contain Non-perchlorate, a type of salt the dissolves quickly and enters groundwater and surface water easily.  Some states have classified this as "Hazardous Waste". LED Road Flares are not hazardous when disposed of properly.

Finally, an example of what LED Road Flares look like can be found on these websites,

[Www.powerflare.com](http://www.powerflare.com/)

[www.turboflareinternational.com](http://www.turboflareinternational.com/).

Thank you very much Chairmen and committees advisory panel.

Victor Pandolfi