

IRRC Original: 2510

From: Jim Abromitis, Jr. [jabro@pehsc.org]
Sent: Tuesday, January 17, 2006 5:58 PM
To: IRRC; Jewett, John H.
Cc: janette Kearney
Subject: Proposed Regulation #18-404 (#2510), Flashing or Revolving Lights on Emergency and Authorized Vehicles, Department of Transportation

January 17, 2005

John Jewett
 Regulatory Analyst
 INDEPENDENT REGULATORY REVIEW COMMISSION (IRRC)
 333 Market Street, 14th Floor,
 Harrisburg, PA 17101

Dear Mr. Jewett:

The Pennsylvania Emergency Health Services Council (PEHSC) is the advisory council to the Pennsylvania Department of Health, EMS Office or all matters pertaining to Emergency Medical Services within the Commonwealth.

As the EMS advisory council, we have carefully reviewed and compiled comments regarding the Proposed Regulation #18-404(#2510) regarding Flashing or Revolving Lights on Emergency and Authorized Vehicles and have compiled the following points to consider that directly affect Pennsylvania's ambulances:

1. Increasing the two flashing or revolving white lights to three. From both an oncoming driver perspective and the emergency driver perspective additional white lights can adversely affect the ability to see/visualize the highway. Particularly in fog or poor weather conditions, the additional white lights will worsen the vision of an emergency driver. We don't understand why the present standard of 2 white lights is not sufficient. Clarification is needed to understand the rationale for increasing the lights to three.
2. Front bumper mounted light appears it can be any color. We would recommend it to be RED only. This has been the standard color and again we are unaware of compelling data to suggest some other color be used for EMS vehicles.

In further clarifying our points, the following specific sections are cited:

- **Section 173.2, Definitions- Intersection Lights.** The proposal is to eliminate the specific place where the lights are to be mounted from the upper portion of each fender to wherever a manufacturer wants to mount the lights. We would recommend that it stay where it is currently indicated which would allow for better visibility enhancement. In addition, the current allowable color is red and the proposal is to add blue and white as color choices. Blue lights are not permitted in a light bar assembly for ambulances so how can blue be permitted. If changes are made, the additional colors should be yellow and amber.
- **Section 173.3(a)(3), Display requirements-**the use of blue lights on personnel vehicle for individuals who respond to emergency situations should also include QRS personnel. There are some instances where individuals may belong to ambulance services or volunteer fire departments who may not be considered ambulance personnel or volunteer fire fighters. There may also be a stand alone QRS. Perhaps clarification is needed on who should be able to use blue lights! These personnel need to be included in 75 Pa.,c.s. Section 4572(a).
- **Section 173.2 (5)(iii), Display requirements-Yellow or Amber Lights-** We agree that the last sentence should be changed to read "Shall be mounted to face to the front or to the rear of the vehicle."
- **Section 173.2(6), White or clear lights-**While it adds a third white or clear light to the light bar assembly, the very next paragraph (i) states that the center light, if there are three, can only flash to the front of a vehicle but paragraph (ii) says that once the vehicle is stationary the lights cannot display to the rear. If this is included, it would require the driver to manually turn off the lights, which if there isn't a separate switch for the white/clear lights, the entire light bar would be turned off. This would create a potentially dangerous situation at an emergency scene.

1/18/2006

- **Section 173.2(10)(d)(v)(E)(4)(v)**-We suggest changing the wording to say "On the rear of emergency vehicles owned by a fire company and/or ambulance service."

Although the proposed regulation changes have been created to provide a greater flexibility with lighting options, we suggest that the IRRC consider the aforementioned points when addressing the specific needs of Pennsylvania's ambulances.

Thank you for the opportunity to provide written comments in regards to the proposed changes to the current regulations.

If you should have any questions or comments, please do not hesitate to contact via this e-mail or phone at 717-730-9000.

Sincerely,

Jim Abromitis
EMS Specialist
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