

Original: 2510

Allen, Lawrence

From: Rugh, Raymond
Sent: Wednesday, January 18, 2006 9:37 AM
To: Allen, Lawrence
Subject: Fw: [Fwd: Proposed Regulation #18-404 (#2510), Flashing or Revolving Lights on Emergency and Authorized Vehicles, Department of Transportation]

Fyi

Sent from my BlackBerry Wireless Handheld

-----Original Message-----

From: Jim Abromitis, Jr. <jabro@pehsc.org>
To: RRUGH@STATE.PA.US <RRUGH@STATE.PA.US>
Sent: Wed Jan 18 09:37:15 2006
Subject: [Fwd: Proposed Regulation #18-404 (#2510), Flashing or Revolving Lights on Emergency and Authorized Vehicles, Department of Transportation]

----- Original Message -----

Subject: Proposed Regulation #18-404 (#2510), Flashing or Revolving Lights on Emergency and Authorized Vehicles, Department of Transportation
Date: Tue, 17 Jan 2006 17:58:26 -0500
From: Jim Abromitis, Jr. <mailto:jabro@pehsc.org> <jabro@pehsc.org>
Reply-To: jabro@pehsc.org
Organization: PEHSC
To: irrc@irrc.state.pa.us, jjewett@irrc.state.pa.us
CC: janette Kearney <mailto:jkearney@pehsc.org> <jkearney@pehsc.org>

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 need 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.

*

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
jabro@pehsc.org

Pennsylvania Chiefs of Police Association

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January 11, 2005

Raymond Rugh
Chief, Equipment Division
Department of Transportation
17th and Arsenal Boulevard
Harrisburg, PA 17120

Dear Mr. Rugh:

The Pennsylvania Chiefs of Police Association is in receipt of a proposed regulation and wishes this letter to serve as public comment on such. The proposed regulation is identified as Regulation #18-404, (#2510) and entitled "Flashing or Revolving Lights on Emergency and Authorized Vehicles."

Our comments are as follows:

§ 173.3. Display requirements.

(4) **Combination red-and-blue lights.** [Under] Vehicles listed under 75 Pa.C.S. § 4571(b)[, police, sheriff, coroner, medical examiner or fire police vehicles may be equipped with flashing or revolving blue lights in addition to red lights—combination red-and-blue lights] may display combination red-and-blue lights. The privately-owned vehicles [of a police chief, assistant police chief, fire police captain and fire police lieutenant] listed under 75 Pa.C.S. § 102 (relating to definitions of an emergency vehicle) shall be equipped under [paragraph (2)] 75 Pa.C.S. § 4571(a).

It is our position that ONLY POLICE should have the combination of red and blue lights. This would make it very clear to the motoring public that a vehicle displaying this color combination is a law enforcement agency that is authorized to affect a traffic stop. It is imperative that law enforcement solidify the public's recognition of a vehicle for which they must stop and this recognition needs to be consistent. Without such recognition, the public's safety is at risk allowing greater potential for impersonation of a police officer, abuse of power and other concerns. **The combination of red and blue lights should only be for police officers.**

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Chief Sal Mecca-2008
Dunmore Borough

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Amy Cori
Executive Director

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(3) Authorized vehicles.

(ii) The installation or use of additional flashing or strobe lights in existing vehicular lighting modules/assemblies, such as headlights, parking lights, taillights, is expressly prohibited.

By our interpretation, this would remove the ability from law enforcement to put strobe packs inside corner parking lamps or break lamps or inside back-up lamps which is a common practice today and has been for some time. Additionally, no where do the proposed regulations permit the use of incorporating the ability to flash the white back-up lamps in conjunction with flashing red tail lamps as is also current practice in many police agencies.

This would be an absolute detriment to law enforcement and a very serious safety concern. The public needs to be able to clearly see a police vehicle for their own safety as well as the safety of the police officers. This proposed regulation takes us back to the early 1980s where "flashing four ways" were the only indication of a police vehicle pulled off to the side of a roadway. We have made great strides in safety for law enforcement officers and continue to try to do so with legislation such as SB 703 requiring motorists to Move Over when they see a police vehicle engaged in a traffic stop. A step backwards such as this opens the door to serious safety issues for law enforcement and those they are sworn to protect and serve.

This letter shall also serve as our formal request to receive notice of any amendments or changes to the proposed regulation pursuant to Sections 5.1(a) and (b) of the Regulatory Review Act.

Thank you for the opportunity to comment on these proposed regulations.

Sincerely,


Amy K. Corl
Executive Director

cc: John R. McGinley, Jr. Chairman, IRRRC re: regulation number: #18-404, (#2510).