



July 19, 2019

Rules Docket Clerk
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: National Highway Traffic Safety Administration No.: NHTSA-2019-0036; Advance Notice of Proposed Rulemaking on Removing Regulatory Barriers for Vehicles with Automated Driving Systems posted 05/28/2018

Dear Rules Docket Clerk:

The following comments to the docket ID: NHTSA-2019-0036 are submitted on behalf of the American Traffic Safety Services Association (ATSSA). The association represents the manufacturers and installers of traffic safety devices as well as roadway owners interested in traffic safety. ATSSA's Core Purpose is To Advance Roadway Safety and eliminate all roadway fatalities. Our members are on the front lines in temporary traffic control zones and the invention, manufacture, sale and installation of most of the traffic control devices used on our nation's roadways.

First, ATSSA would like to thank National Highway Traffic Safety Administration (NHTSA) for the opportunity to comment on this rapidly changing topic of automated driving systems-dedicated vehicles (ADS-DVs). We also would like to commend NHTSA for asking these critical questions that will shape the industries future over the next 5, 10, 20 years and beyond. Just like all new topics, critical thought and comments from all stakeholders are needed.

If changes to the regulatory requirements for vehicles with ADS-DVs, NHTSA should consider the heightened risk to roadway workers if changes in the interior configurations would delay a human retaking control of the vehicle as studies show drivers need a minimum of 8 to 10 seconds to regain situational awareness. Additionally, ATSSA encourages NHTSA to work closely with FHWA and Automated Driving System manufacturers to consider the impacts of any changes on our state and local transportation agencies. Most of our nation's roads are governed by county, city or township jurisdictions. With over 270 million vehicles in the US now, the rate of adoption is an unknown for state and local agencies and NHTSA in coordination with FHWA could provide forecasting models for the adoption rate of ADS, so that state and local jurisdictions can make informed decisions based on the design vehicle that are to be accommodated by short and long-term transportation improvement planning. We encourage NHTSA to work with ATSSA as we support advances in roadway safety and the elimination of all roadway fatalities.

Thank you,

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