



July 22, 2019

Via Regulations.gov

Cem Hatipoglu, Ph.D.
Associate Administrator for Vehicle Safety Research
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

**RE: Notice and Request for Comments; Proposed Collection of Information;
Driver Interactions with Advanced Driver Assistance Technologies
[Docket No. NHTSA-2019-0037]**

Dear Dr. Hatipoglu:

The Motor & Equipment Manufacturers Association (“MEMA”) writes in response to the National Highway Traffic Safety Administration (“NHTSA”) *Federal Register* notice entitled “Agency Information Collection Activities; Notice and Request for Comment; Driver Interactions With Advanced Driver Assistance Technologies” (NPRM).¹ MEMA represents over 1,000 companies that manufacture motor vehicle parts for use in the light- and heavy-duty vehicle original equipment and aftermarket industries.² MEMA’s members play a key role in developing the components and systems that improve vehicle safety, efficiencies, and emissions.

Introduction

MEMA represents a broad spectrum of motor vehicle equipment manufacturers, including those suppliers that develop state-of-the-art crash avoidance and mitigation systems. As key innovators of advanced vehicle technologies, suppliers are on the forefront of evolving and engineering the sensors, components and systems vital to enhancing, integrating, and evolving these systems. Many types of advanced driver assistance systems (ADAS) are foundational technologies upon which more complex levels of automated driving systems are built.

MEMA previously evaluated the potential impact of a suite of ADAS technologies. Our research showed that nearly 10,000 fatalities could be prevented, 28 percent of crashes could be avoided, and more than \$250 billion could be saved annually with technologies that are available today.³ Since that study, suppliers continue to develop and improve these safety critical systems and vehicle manufacturers continue to make these safety features increasingly available on more vehicle platforms as either standard or optional equipment. It is essential for drivers to understand the capabilities and limitations of ADAS technologies.

¹ 84 *Fed. Reg.* 23154 (May 21, 2019).

² MEMA represents its members through four divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); Motor & Equipment Remanufacturers Association (MERA); and, Original Equipment Suppliers Association (OESA).

³ MEMA and Boston Consulting Group, “[A Roadmap to Safer Driving through Advanced Driver Assistance Systems](#)” Sept. 2015



Proposed Information Collection Request

MEMA has voiced support for previous agency efforts to update consumer education and understanding of ADAS technologies by updating the U.S. New Car Assessment Program safety ratings – specifically, to include several crash avoidance and mitigation technologies.⁴ Additionally, MEMA has long supported Section 24322 in the FAST Act of 2015 to improve consumer information, education, and understanding of crash avoidance technologies.⁵ Both actions were intended to improve consumer education and understanding of safety technologies, but remain stuck in neutral.

The proposed information collection request (ICR) notice indicated NHTSA's research will evaluate drivers' interactions with only two types of ADAS technologies – Advanced Cruise Control (ACC) and Lane Keeping Assistance Systems (LKAS). Therefore, while MEMA understands the agency's desire to research and evaluate driver interactions with certain ADAS technologies, we encourage the agency to continue any parallel efforts related to evaluating the inclusion of a variety of crash avoidance and mitigation systems in the U.S. NCAP and enhancing consumer information about these technologies on vehicle placards.

MEMA believes that the resulting analysis of the proposed ICR has practical utility for NHTSA as an important component of a multi-faceted, comprehensive evaluation of ADAS technologies, which includes how drivers interact with them. MEMA supports the proposed ICR. We ask the agency to consider the following to enhance the quality, utility, and clarity of the information collected:

- Improve Survey Accuracy/Results – MEMA recommends increasing the sample sizes from 300 to 500 and 600 to 800, respectively. Also, we suggest having a second experimental drive a few days after the first experimental drive.
- Traffic Conditions – The notice explains that drivers will be on a specified designated route on public highways but does not clarify the type of traffic or environment. MEMA suggests that during an experimental drive, respondents should experience different types of traffic conditions. For example, of the respondents, an equal amount should experience the technologies during known times of higher volume traffic, whereas others should experience the same technology during times of moderate or light traffic. Furthermore, the systems defined in the survey may react differently across varying traffic densities, which may influence the participants' responses in the post-drive questionnaire. Responses collected in various traffic densities may provide more meaningful data, such that it can represent a fuller scope of densities that occur during real-world use.

Summary

The proposed ICR to improve NHTSA's understanding of how drivers interact with two types of ADAS technologies is important and we support the agency's ICR as well as other agency research

⁴ For more, please view the written comments from MEMA posted in the public docket:

[NHTSA-2018-0055-0052](#), Request for Comments on the New Car Assessment Program, Oct. 31, 2018;

[NHTSA-2015-0119-0282](#); Request for Comments on the New Car Assessment Program, Dec. 16, 2015.

⁵ Public Law No: 114-94, Division B, Title XXIV, Subtitle C, Part II, Sec. 24322: "to ensure that crash avoidance information is indicated next to crashworthiness information" on new vehicle window stickers so that consumers are better informed.

projects related to advanced vehicle safety technologies. At the same time, MEMA continues to urge NHTSA to leverage existing consumer education tools, like U.S. NCAP, to improve consumer education and understanding about a variety of ADAS technologies that are available on today's vehicles. NHTSA is well-positioned to encourage and incentivize wider driver adoption of crash avoidance and mitigation technologies.

Thank you for your consideration of MEMA's comments. Please contact me for any questions or additional information.

Regards,

A handwritten signature in blue ink that reads "Leigh S. Merino". The signature is written in a cursive, flowing style.

Leigh S. Merino
Vice President, Regulatory Affairs