



NEW FLYER OF AMERICA

August 26, 2019

James Owens
Acting Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave., S.E.
Washington, DC 20590

Re: Removing Regulatory Barriers for Vehicles With Automated Driving Systems - Docket No. NHTSA-2019-0036

Acting Administrator Owens:

New Flyer of America Inc. (New Flyer), a subsidiary of NFI Group Inc. (NFI), the leading independent global bus manufacturer, is proudly powered by over 2,400 team members across the United States. New Flyer is pleased to respond to the U.S. Department of Transportation's (U.S. DOT) National Highway Traffic Safety Administration (NHTSA) advanced notice of proposed rulemaking on "Removing Regulatory Barriers for Vehicles With Automated Driving Systems."

New Flyer continues to build on its 85+ year legacy of innovation to deliver state-of-the-art transit technology that meets the complex demands of communities today and into the future. We encourage the U.S. DOT and NHTSA to continue investing in the research and development of emerging technologies, fostering an agency-wide culture of exploring advancements in the evolution of automated vehicle technologies.

With a guiding principle focused on public safety, New Flyer is working to advance development and deployment of technology for advanced driver-assistance systems and automated vehicles. New Flyer supports U.S. DOT's technology-neutral position to facilitate the deployment of automated vehicles. We encourage U.S. DOT and NHTSA in placing a priority on assessing existing regulatory approaches to address potential barriers for new and emerging technologies relating to automated vehicles.

To this end, New Flyer recommends NHTSA consider an approach to establish new definitions that apply exclusively to automated driving system-dedicated vehicles (ADS-DV) without traditional manual controls. As manufacturers invest in introducing new vehicle designs and technologies, the industry will need new terms, definitions, and methods that are not covered in existing standards or established testing or certification methods and practices. Therefore, New Flyer recommends NHTSA consider drafting, with stakeholder input, Federal Motor Vehicle Safety Standards (FMVSS) for ADS-DV to modify safety requirements. Developing dedicated FMVSS for ADS-DV will thereby not impact the current FMVSS for human-driven vehicles.

Furthermore, though NHTSA has offered six test methods, each with their own advantages and disadvantages, New Flyer encourages NHTSA to consider multiple approaches in testing vehicles that lack traditional controls. New Flyer encourages NHTSA to establish a working group with private sector industry leaders, public transit agencies, research institutions, and standards organizations to address uncertainties presented by standardization and testing of ADS-DV.

As the trusted industry leader, we are constantly innovating, developing, and testing new technologies such as automated driving and driver assistance tools. We look forward to continuing to work with U.S. DOT, NHTSA, and the Federal Transit Administration in advancing the safe deployment of automated buses. Please feel free to reach out to me directly should you have any questions or would be interested in additional information.

Sincerely,

A handwritten signature in blue ink that reads "Chris Stoddart". The signature is fluid and cursive, with the first name "Chris" and last name "Stoddart" clearly legible.

Chris Stoddart
President
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