

Comment from Theodore Steichen

Thank you for the opportunity to comment on this proposal to amend Federal Motor Vehicle Safety Standard (FMVSS) No. 141, Minimum Sound Requirements for Hybrid and Electric Vehicles, to allow manufacturers of hybrid and electric vehicles (HEVs) to install a number of driver-selectable pedestrian alert sounds in each HEV they manufacture.

If manufacturers want to offer a range of sounds to be used at low speed as an amenity to their customers, I suggest the Agency finalize the regulations to provide some flexibility within appropriate limitations.

The intention of the authorizing law is to provide a warning in order to prevent people that normally don't hear quiet cars to be alerted as if an internal combustion engine was present. So long as any options offered by manufacturers for low speeds forward driving are demonstrably intended to fulfill that requirement, then a range of sounds could be an option. Vanity sounds, music riffs or other options that are more a demonstration of personality or association of the driver should not be allowed. Public spaces are already a potential cacophony of blaring music from passing vehicles and altered or poorly maintained exhaust systems. It could be argued that the approved sound should simply equate to the current sound from the internal combustion engine from that car at the various driving conditions. Although, since manufacturers apparently believe a single sound will harm their business it seems a reasonable compromise to provide flexibility when establishing forward motion sounds, but each sound should be judged to provide the warnings originally believed to be needed to save lives.

In the case of vehicles moving in reverse, the only approved sounds should be a variation of the existing electronic back-up sound that people already hear from vehicles so equipped when placed into reverse. This existing auditory queue should not be expanded upon.

Thank you again for the opportunity to provide comments on this proposal.