

Comment from Michael Smith

I would like to comment on the proposal to Amend 571.141 by revising paragraph S5.5.1 and S6.7.3 to read as follows:

571.141 Standard No. 141; Minimum Sound Requirements for Hybrid and Electric Vehicles

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S5.5 Sameness Requirement

S5.5.1 Any two vehicles of the same make, model, model year, body type, and trim level (as those terms are defined in 49 CFR 565.12 or in section S4 of this safety standard) to which this standard applies shall be designed to have the same pedestrian alert sound or set of sounds, when operating under the same test conditions and at the same speed within the range of test conditions and speeds for which an alert sound is required in Section S5 of this safety standard.

COMMENT: Have you taken into consideration how many makes, models, model years, body type, and trim level of hybrid and electronic vehicles are manufactured each year by all manufacturers, as well as projections for the next, say, 10-years?

To allow each manufacturer to create and utilize its own pedestrian alert sound or set of sounds for each make/model/year/body/trim will likely result in an obnoxious cacophony of noise if more than one vehicle is within hearing distance. Can you imagine a typical city intersection which could easily have 4 or 4X electric and hybrid vehicles accelerating/decelerating to/from the sound regulated speeds? And how is one to know what each sound means? Is that sound for coming or going? Or, more importantly to the blind what does that sound mean and where is it coming from?

Allowing this multitude of sounds to be created by each manufacturer in a vacuum certainly gives the manufacturers their capitalist freedom to express their individuality in the market, and any noise required of such vehicles will at least help everyone know something is approaching, but I can only see this rule-making amendment resulting in greater noise pollution that will make it more difficult to understand the basic purpose of the noise - to assist those with and/without sight to directionally hear a silent vehicle approaching.

I dread the branded cacophony of different noises that will result from this regulation. A simpler approach that limits all vehicle manufacturers to use of a single noise will more easily be learned and understood by everyone who the regulation is designed to assist and should lead to greater safety which is the purpose behind the regulation. Is it really more important or safer that the pedestrian/bicyclist knows it is a Kia or a Jaguar that is silently approaching them?