

Comment from Paul Brett

Greetings.

In regards to NHTSA-2018-0021, it is my opinion that the installation of cameras instead of mirrors is not suitable. Mirrors have a clearly demonstrated reliability, limited failure modes, simpler clearance, and easily affordable replacement costs. My impression is that cameras are not there yet in all three concerns, in particular cost to consumer given the costs associated with replacing other electronics in automobiles. Additionally many consumers energy in terms of clearing cameras may be less than desirable such that they may elect to operate the vehicle in lieu of ensuring the cameras are properly cleared.

For now, my suggestion is that manufacturers provide both while NHTSA collects data on reliability and cost data. If at some future time it is demonstrated that these conditions are met, then it would behoove having this conversation again.