

## Comment from David Lyons

Re: Docket No. NHTSA-2019-0082

I am steadfastly 100% against replacing mirrors with a camera system.

An electronic camera system would be static and limited by the viewpoint of the camera itself. A driver can change his position relative to the mirror or move the mirror itself to expand his view of surroundings.

A camera system can fail, or lose power. With mirrors, they continue to function regardless of battery power and can even be manually moved if the vehicle battery is dead. A camera can also become useless from fog or condensation that can accumulate on the lens. A screen monitor can also fail or become obscured by occupants or items in the vehicle as well.

With static mirrors, a driver's activity is focused on looking outside the motor vehicle. With a camera system, the driver's eyes will be always looking and focused on the interior of the vehicle. This would have the effect of the driver losing the practice of looking outside of any windows to see his surroundings. An accident would result based on a driver's claim that "I checked the camera and nobody was there."

These systems present a dangerous slippery slope on making drivers more and more dependent upon technology for controlling a 2 ton moving block of steel, which is by definition a manual and physically interactive process using direct interpretation of the five human senses. A camera system removes the driver from that process, numbing him/her to actions taking place in proximity that pose extreme risk and danger to life.

Technology has the ability to provide safety features that can create greater and safer control over vehicle handling. The camera system to replace mirrors is not an adequate substitute, nor does it come close to replacing direct line of sight.