

Comment from Max Kalashnikov

I am distressed by the fact NHTSA is even seeking comment on "how a driver should be alerted that a CMS is not operating correctly, such as during a malfunction or a software update". This is a safety-critical software system, a component of a broader safety-critical system encompassing the entire vehicle. There is ample knowledge on how to such determinations, documented in, for example, {Engineering a Safer World: Systems Thinking Applied to Safety} by Nancy G Levinson and the many publications referred to in its endnotes.

NHTSA should only consider requiring that a CMS be capable of allowing a driver to determine whether it is safe to open the vehicle door when parked alongside a traffic lane while the ignition is off if there is an analogous requirement for powered mirrors which automatically retract.