

Albuquerque, NM 87110

October 30, 2019

NHTSA
Washington, D.C.

Topic: Docket No. NHTSA-2018-0021

Dear Sir or Madam:

Technology is changing by leaps and bounds, the Federal Motor Vehicle Safety Standards (FMVSS) can only address the manufacturing phase of the cameras and displays being installed during manufacturing. The problem with our vehicles today is the overload of computers and electronics. The Commercial Vehicle Safety Alliance will have to address the issue of non-operational cameras/screens in the Out-of-Service Criteria and the Federal Motor Carrier Safety Administration will have to add requirements to 49 CFR Part §393 to ensure the review cameras and displays are functioning.

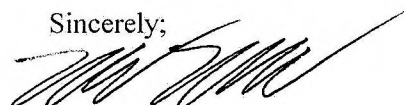
It is unclear how the FMVSS would be worded to ensure the rearview cameras and displays would be integrated into the vehicle's systems to assure the rearview cameras and displays were a "MAIN" system mandated for safety opposed to a secondary system. Part §571.5 lacks any reference material to address the new rearview system. The FMVSS has caused some problems for the motoring public, i.e. LED lighting that's too bright even on low beam. To allow devices to be added to the vehicle's electrical systems without sound guidance provides a path for possible issues.

I have attended presentations provided by vehicle manufacturers that discussed issues associated with electrical problems in lighting caused by too much current being drawn by other systems, i.e. problems with fuel management when an owner added decorative lighting to their cars. The electrical systems in today's cars are highly engineered to fully utilize the electricity provided by the battery/charging system and the consumption needs of the various computers onboard. I suspect the current electrical systems are at full capacity with air conditioning, power mirrors, and a vast array of gauges with interior lighting to adequately see the instrument cluster, etc. Drivers of large trucks typically add alternating current power converters to run their TVs, DVD and coolers to name a few. The direct current system is further challenged with universal serial bus chargers for cell phones and lap top computers. The electronic logging device required by 49 CFR Part §395.8 not addressed in the FMVSS adds to the current drawn from the electrical system.

I believe the NHTSA should examine the current electrical load placed on most vehicles and look for organizations that have established engineering standards so an adequate reference may be incorporated in 49 CFR Part §571.5. Manufacturers should at a minimum be required to assure the alternator used to provide the voltage for the vehicles is adequate to meet the electrical consumption needs and require adequate gauge wire be installed to avoid electrical fires caused by too much current burning off the insulation of the wiring. I suspect there may be issues with diesel exhaust fluid (DEF) having similar issues as multiple truck fires have been caused by issues with DEF systems.

Thank you for your time and consideration in addressing my concerns.

Sincerely;



Michael Millard