

Comment from David Ganss

Hello,

Please consider older drivers and changes to vision (specifically speed to focus) when analyzing this rule.

As individuals age, the eyes often slow in their focus response. In a camera-based vision system, this may cause a loss in ability to quickly identify objects in the rear view display. This is because in a camera display system, the eye must focus on the display itself which is close to the eye while in a mirror-based system, the eye can remain focused at long distance. The time needed to adjust focus from far to close may adversely impact safety. Also adjusting focus from far to near several times per minute while driving will increase driver fatigue and may actually discourage the use of these systems.

While camera-based systems can certainly offer advantages in field-of-view and display placement, some method of mitigating the need to constantly change focus from far to near must be implemented, or these systems risk trading one set of limitations for another, more dangerous one.

Thank you for your consideration.