

Federal Motor Vehicle Safety Standard No. 111, Rear Visibility

This Proposed Rule document was issued by the **National Highway Traffic Safety Administration (NHTSA)**

Document Information

ID: NHTSA-2018-0021-0005

Federal Motor Vehicle Safety Standard No. 111, Rear Visibility

This Proposed Rule document was issued by the National Highway Traffic Safety Administration (NHTSA)

Document Information

ID: NHTSA-2018-0021-0005

Date Posted: Oct 10, 2019

RIN:2127-AM02

CFR:49 CFR Part 571

Federal Register Number:2019-22036

Written information should be submitted by December 9, 2019.

Federal eRulemaking Portal: Go to <http://www.regulations.gov>. Follow the instructions for submitting comments on the electronic docket site by clicking on “Help” or “FAQs”.

You may call the Docket Management Facility at 202-366-9826.

I support the proposed rule # NHTSA-2018-0021-0005 for the following reasons and agree with the change of side and rear mirrors to cameras, by taking into account all the advantages and disadvantages that are listed here. Certainly, this is a very good idea to use these cameras instead of the side and rear mirrors in both trucks and cars. It is evident that by doing so, it becomes necessary to educate the public. However, in case of emergencies, all vehicles should be equipped with some kind of emergency mirrors.

According to the information gathered through my research, the replacement of side and rear mirrors has advantages and disadvantages.

There are lots of reasons for companies to come with this idea.

- 1- Lots of accidents happen because of the blind spot with our conventional side mirrors, especially in the case of trucks that have a larger blind spot than regular vehicles.
- 2- The weather conditions that blur the side windows and side mirrors, especially in the case of ice and snow and rain or fog.
- 3- The non-efficiency of back mirrors and fatal accidents, especially the children under 5 years old.
- 4- In case of work trucks, or dump trucks, that they don't have access to back windows, the rear mirror is useless.
- 5- In the case of old peoples that they don't have enough mobility.
- 6- At night and dark environment, the vision through mirrors are very limited or close to nothing.

7- The hydrodynamic shape of the car and full efficiency.

Advantages:

1- Tesla and BMW are pioneering the replacement of mirrors with cameras. The LCD is installed where rear mirrors are right now, bring together the images of rear and side cameras. BMW uses Gorilla Glass to cover the side cameras and has a heating element to melt snow and ice, making the system more weather-resistant than side mirrors.

2- According to Henrie van Beusekom, Executive Director of Orlaco, Orlaco cameras have optical systems that offer a wide range of visibility up to 270 degrees. Orlaco uses 3D CAD simulation environments and this system it's on its way to ensure optimal visibility.

3- At night, cameras enable the driver to see the whole length of the objects close to the car, while with mirrors, drivers won't be able to see that.

4- These cameras are equipped with an alerting system that stimulates the driver to act faster or accordingly.

Disadvantages:

1- Human factors, it takes time for drivers to get educated with cameras and to be able to trust them.

2- Cameras won't make humans a better driver.

3- Some people use the display for other needs while driving (news, commerce).

4- Initial cost of cameras and further repair.

5- A system breakdown and complications.

It is for these strong reasons that I agree with this big change to the vehicles and trucks.