



October 17, 2019

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
West Building Ground Floor  
Room W12-140  
Washington, DC 20590-0001

Subject: Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors, Request for Comments, Docket No. NHTSA-2019-0082.

Dear Mr. Johnson,

Lotus Cars Ltd. appreciates the opportunity to provide the following comments and recommendations in response to the National Highway Traffic Safety Administration (NHTSA) Request for Comments published on 28<sup>th</sup> August 2019 regarding the Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors. Lotus Cars Ltd. is a European vehicle manufacturer and endorses the use of Rear-View Cameras to improve the road safety and environment protection.

The introduction of Camera-Based Rear Visibility Systems replacing the Rear-View Mirrors will have a major impact on the drag coefficient of our vehicles and it means that the fuel consumption and emissions levels will be reduced, improving air quality.

The use of Rear-View Cameras improves the safety of drivers, pedestrians and cyclists due to the fact that Camera-Based Rear View Systems provide a wider field of view behind the vehicle in comparison with a standard Rear-View Mirror (according to Technical Report No. DOT HS 812 582) and a standard Rear-View Mirror increases the total width of the vehicle and subsequently the probability of a collision with a pedestrian or cyclist passing between cars in traffic or in a car park. Also, the addition of sensors/cameras that detect the presence of an obstacle or a vehicle in a blind spot could be incorporated to assist in avoid a crash.

Lotus Cars Ltd. would kindly recommend to the National Highway Traffic Safety Administration (NHTSA), to include in FMVSS 111 the option of Camera-Based Rear Visibility System (giving the manufacturers the choice of using Rear-View Cameras or Rear-View Mirrors) and to support the sustainable growth of the global vehicle manufacturers the second recommendation is to harmonize the Federal Standard for Camera-Based Rear Visibility Systems with the European Standard (ECE R 46-04 Articles 6.2 and 6.3).

Sincerely,

A handwritten signature in black ink, appearing to read 'Erico Aldin', written in a cursive style.

Erico Aldin  
Homologation Engineer  
Lotus Cars Ltd. Homologation Affairs