

October 28, 2019

National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Docket Comments: National Highway Traffic Safety Administration
Docket Number NHTSA–2019–0082
Notice and Request for Comments on a Proposed Collection of Information
Drivers’ Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors

The Volvo Group is a global manufacturer of trucks, buses, construction equipment and marine and industrial engines. Volvo Group develops, manufactures, and sells heavy-duty trucks, buses and motor coaches and their powertrains in the U.S. under the brand names of Volvo Trucks, Mack Trucks, Volvo Buses, Nova Bus, and Prevost. The Volvo Group has been manufacturing in the U.S. since 1900 and directly employs nearly 15,000 Americans. Our major facilities are in North Carolina, Pennsylvania, Virginia, Maryland, and New York. We have invested nearly \$2 billion in our nine manufacturing facilities since 2002 and spend more than \$250 million in R&D in the U.S. every year. The Volvo Group respectfully submits the following comments to NHTSA’s Notice and Request for Comments on a Proposed Collection of Information(NRCPCI) for the Drivers’ Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors, (hereafter “e-mirrors”).

INTRODUCTION

Volvo Group has long been a leader in developing and implementing safety technologies on motor vehicles. Along with Environmental Care and Quality, Safety is a core value of Volvo Group. Safety is deeply rooted in our culture and heritage with an approach of "Safety by Design" where we continue to develop and provide safety features to our customers in advance of regulations.

As a general matter, Volvo Group believes that e-mirrors present a significant potential to address societal challenges regarding safety and energy efficiency and supports NHTSA’s approach to advocate for their safe introduction to the market. We believe that e-mirror equipped vehicles have the potential to save lives on US roads.

In 2019 Prevost has tested different e-mirror technologies and configurations from different suppliers. In collaboration with one of our key customer, Prevost has also presented a demonstration vehicle to NHTSA representatives in June 2019.

SUPPORT FOR NHTSA’S APPROACH AND REGULATORY AUTHORITY

As stated, Volvo Group agrees with NHTSA’s approach to foster the safe introduction of e-mirrors. Furthermore, Volvo Group agrees that on-road vehicle safety is within NHTSA’s purview and statutory mandate. Volvo Group supports the continuation of the self-certification framework, and supports that NHTSA have preemption over US states for vehicle design regulatory standards for e-mirror. This will provide regulatory certainty for new product development, maintain the current national safety

assurance paradigm, and preclude the risk for a patchwork of state regulations that will serve only to delay implementation of this safety technology by increasing product costs.

COMMENT

Volvo Group's comment to the NRCPCI can be found below.

Include over-the-road(coach) buses and transit buses in the study targeting heavy trucks vehicles following the light vehicles study.

CONCLUSION

The Volvo Group appreciates the opportunity to comment on this significant rulemaking activity and recognizes the effort NHTSA is putting forth to understand and eliminate barriers to the adoption of vehicles equipped with e-mirror technology. E-mirror technology has the potential to improve safety on our nation's highways while improving the efficiency of transportation. As a heavy duty vehicle manufacturer who is testing e-mirror technology, we look forward to working with NHTSA, other DOT Agencies, and other stakeholders on the safe introduction of e-mirror equipped vehicles. If you have any questions, please contact Sylvain Claude at 438.843.1428 or sylvain.claude@volvo.com.