UNITED STATES DEPARTMENT OF TRANSPORTATION

NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

Docket No. NHTSA-2019-0082: Agency Information and Collection Activities; Notice and Request for Comments; Drivers' Use of Camera-Based Rear Visibility Systems vs. Traditional Mirrors

COMMENTS OF GREYHOUND LINES, INC.

October 28, 2019

Greyhound Lines, Inc. ("Greyhound") strongly supports NHTSA's information collection activities with regard to camera-based rear visibility systems ("rear view cameras") vs. traditional mirrors ("mirrors"), but urges NHTSA to expand those activities to include over-the-road buses ("OTRBs"). The potential safety benefits of rear view cameras vs. mirrors on OTRBs are at least as great, if not greater, than for the other vehicle classes. Greyhound has done considerable research and testing of OTRB rear view cameras, which could benefit NHTSA's information collection activities. Moreover, Greyhound and its drivers offer a unique nationwide platform for NHTSA's testing and information collection.

NHTSA proposes "to learn about drivers' use of camera-based systems designed to replace traditional outside rear view mirrors", focusing its research first on light vehicles and then on heavy trucks. Over-the-road buses are not mentioned. In Greyhound's view, OTRBs definitely should be included in NHTSA's research effort. From a safety standpoint, OTRBs are, if anything, more important than heavy trucks in that they carry people, not freight.

Moreover, given the nature of bus transportation, rear view cameras could provide unique safety benefits for OTRBs. Greyhound serves almost every major American city with multiple daily schedules. Because so much of its operations are conducted in congested urban environments, accidents involving bus mirrors striking a foreign object are the most frequent Greyhound accidents. We believe that the same is true of most other bus companies. Research demonstrating the viability of rear view cameras as an alternative to mirrors could lead to a substantial reduction in bus accidents.

Because of the unique potential benefits of rear view cameras to OTRBs, Greyhound has worked with bus manufacturers to install and test rear view cameras on buses. That is also why Greyhound demonstrated the use of these systems to NHTSA personnel. Recently in Washington, DC, Greyhound provided a display bus at the DOT Headquarters that was equipped with rear view cameras. The presentation was met with great enthusiasm by USDOT officials and NHTSA staff, who were able to see first hand the increased visibility provided. The bus was equipped with rear view mirrors, in addition to the cameras, which provided a contrast in the viewing area provided by both. It was unmistakable how vastly superior the camera visibility area was over the use of rearview mirrors. The system utilizes four rear-view mirror cameras and two display screens. The field of view of this system is far greater than the legacy mirrors both in convex and standard flat configurations, thereby providing the driver a greater awareness of potentially hazardous targets. This increased field of vision allows for better reaction-time to move the bus from harm's way.

Additionally, it was noted that the rearview cameras work more effectively at night and in other sub-optimal conditions. Technologies in these cameras include integrated night vision enhancing technology combined with glare reduction (both during night and day), higher resolution projected imaging (vibration isolated for diminished bouncing images), and special camera glass treatments with water-shedding technology and heat that eliminate the problem of icing and fogging that can seriously reduce the effectiveness of traditional mirrors.

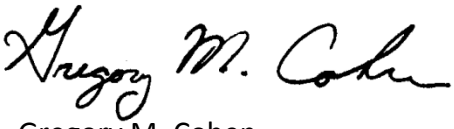
Greyhound provided information on a 10-year review of minor bus accidents in which 15% of those accidents were mirror related. It is believed that by using rearview cameras on buses a significant number of minor accidents can be avoided.

If NHTSA's research and information collection activities are broadened to include OTRBs, Greyhound is willing to continue its cooperation with NHTSA by encouraging its drivers to participate in NHTSA's research and making available its buses to be equipped with the test cameras. As the only nationwide intercity bus company regularly serving every part of the

country and traveling through almost every major American city multiple times daily, Greyhound offers a unique platform for NHTSA to test driver reactions to rear view mirrors in every driving environment.

For all these reasons, Greyhound urges NHTSA to expand its information collection activity with regard to rear view cameras to include OTRBs. If NHTSA does so, Greyhound looks forward to assisting NHTSA's information gathering in whatever manner NHTSA views as most helpful.

Sincerely,



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