October 28, 2019

Mr. James Owens
Acting Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

RE: Docket No. NHTSA-2019-0082; Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors

Dear Acting Administrator Owens:

On behalf of the American Bus Association (ABA), I submit the following comments in response to the National Highway Traffic Safety Administration's Agency (or NHTSA's) Information Collection Activities; Notice and Request for Comment; Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors, Docket No. NHTSA-2019-0082, referred to herein as the ICR.

The ABA supports NHTSA's ICR but questions the scope of the request, along with the scope of the underlying research proposal. According to the ICR, NHTSA proposes to perform research to collect information to learn about drivers' use of camera-based systems designed to replace traditional outside rearview mirrors. However, NHTSA intends to limit the focus of its initial research to light vehicles followed by examination of camera-based visibility systems on ***heavy trucks*** (emphasis added). ABA believes NHTSA should expand this research proposal, and thus the ICR, to include the collection of information and examination of camera-based visibility systems, more broadly, on all types of **commercial motor vehicles (CMVs)**, encompassing both property- and passenger-carrying vehicles. In particular, with the recent publication on October 10, 2019 of an Advanced Notice of Proposed Rulemaking (ANPRM); Federal Motor Vehicle Safety Standard No. 111, Rear Visibility (NHTSA-2018-0021), which applies to all commercial motor vehicles and their use of camera-based rear visibility systems – a broadening of scope for this study of camera-based visibility systems would be well timed and consistent with other Agency actions.

Camera-based visibility systems (CBVS) are currently being installed and tested by original equipment manufacturers on passenger motorcoaches. Further, two companies, Stoneridge, Inc. (Stoneridge) and Vision Systems North America (VSNA), have petitioned the Federal Motor Carrier Safety Administration (FMCSA) for an exemption from 49 CFR 393.80(a) to allow their respective CBVSs to be installed as an alternative to the two rear-vision mirrors required on

CMVs. FMCSA granted Stoneridge's application in February of 2019 (see FMCA-2018-0141), and VSNA's petition is currently open for comment (Docket No. FMCSA-2019-0159), with the likelihood of it also be granted, based on the outcome of Stoneridge's petition.

Both property-carrying and passenger-carrying CMV operations can benefit from advanced vehicle safety technology, and the use of CBVSs applies to both operations. As described in the FMCSA petitions, CBVSs can provide an increased field of vision to CMV drivers, enhanced image quality during adverse weather conditions or time of day and may reduce CMV driver fatigue as a result of a reduction in driver head and eye movement.

As these systems are currently being deployed on both property- and passenger carrying CMVs, ABA believes it prudent, as well as efficient, for NHTSA to expand its initial research proposal and thus the ICR, to pursue research and the collection of information on the use of CBVS in CMV operations, and not limit it to heavy trucks. Addressing both types of CMV operations under this broadened proposal could prevent unnecessary delays, as NHTSA proposes to consider changes to the Federal Motor Vehicle Safety Standards (NHTSA-2018-0021) to incorporate and facilitate broader use of these camera systems for safety purposes.

For these reasons, although ABA supports the ICR, we also request that NHTSA expand both its underlying research proposal and the ICR to examine CBVSs on both property-carrying and passenger-carrying CMVs.

Sincerely,

Brandon Buchanan
Director of Regulatory Affairs