



October 22, 2019

Deputy Administrator James Owens
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket No. NHTSA-2019-0085

Dear Deputy Administrator Owens:

The National Federation of the Blind appreciates the opportunity to comment on the notice of proposed rulemaking (NPRM) regarding proposed amendments to Federal Motor Vehicle Safety Standard (FMVSS) No. 141, Minimum Sound Requirements for Hybrid and Electric Vehicles.

Regarding driver-selectable sound choices, the National Federation of the Blind maintains its position, which was first stated in February 2014, that automobile manufacturers should be permitted to provide consumers a reasonable number of choices, so long as each selectable choice meets the minimum sound requirements defined in the law. We have no objection to manufacturers providing consumers a suite of sounds to choose from, and believe that it will make the idea of having a required sound more palatable to the consumer if said consumer is able to select the sound their automobile will make. In this aspect, we fully support the petition of the Alliance of Automobile Manufacturers and Global Automakers dated January 30, 2017. Furthermore, we do not believe it is necessary to place a restriction on the number of driver-selectable sounds an automobile manufacturer offers because the cost to certify that each newly offered sound meets the minimum requirements will be prohibitive enough to prevent manufacturers from offering more than a reasonable number of sounds.

With regard to the technical clarification and correction pertaining to the evaluation of ambient noise during compliance tests, the National Federation of the Blind supports the comments of the Society of Automotive Engineers.

Thank you again for considering our comments, and we are happy to provide any additional clarification should it be needed.

Sincerely,

Mark A. Riccobono, President
National Federation of the Blind