

## Comment from Andrew Singer

Regarding Acoustic Vehicle Alerting Systems (AVAS) regulation:

Car manufacturers want to turn the requirement that hybrid and electric vehicles emit some sound into a "branding" opportunity where they or their customers can pick any kind of unique noise, music or god-knows-what for their car to play, as if this is just another "self-expression" customization of a consumer product, similar to choosing a smart phone ring tone. But the requirement for these vehicles emitting some noise is first and foremost about public safety and enabling not just the blind but EVERYONE who is walking, biking or otherwise out on public streets and roadways (or thinking about crossing one) to be alerted to the presence of an oncoming automobile. Any noise(s) that these vehicles emit should sound like a "car" and thus have certain defined/mandated qualities that they sound like a contemporary motor vehicle. Otherwise, the blind and everyone else will be at greater risk of being hit if they are unable to recognize a given noise as a motor vehicle.

We don't allow auto manufacturers to choose the color of a car's tail lights, because we've created a universal language that says: "Red lights mean you are looking at the back of a car. Bright red lights (including the center light) means the vehicle is braking or stopped." Similarly, we need a universal language of sound that is instantly recognizable as a "car" whether that car is gas powered or electric. It's an issue of public safety.

Traditional motor vehicles in reverse have a certain whine to their transmissions that alerts someone outside the vehicle that it's backing up. I recommend that NHTSA make a similar requirement for hybrid and electric vehicles.

All of the above being said (and true), noise pollution is another consideration that NHTSA must take into consideration. Whatever noise(s) are chosen must be as quiet as possible. Living next to major streets and highways is a huge annoyance, not only because of particulate pollution but because of noise. Some motor vehicles are very loud and even average cars are louder than they need to be. Car manufacturers are allowed to put fake (or real) loud engine sounds into their vehicles to appeal to consumers. Think of the new Ford Mustangs (fake sound) or Harley Davidson motorcycles (real sounds). The latter, in particular can wake someone out of a dead sleep or drown out a conversation. These vehicles and features like car alarms or reverse warning beepers on trucks and construction vehicles diminish the quality of life in urban areas (and even some suburban and rural ones) and should never have been allowed. All these things, even on traditional gas engines, could be much quieter and NHTSA and other federal regulators should make more of an effort to lower the overall levels of urban noise. I recommend that NHTSA take this approach towards mandated noises for hybrid and electric vehicles.