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DEPARTMENT OF  
TRANSPORTATION

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DOCKET OPERATIONS

To:  
Administrator, National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue SE, West Building  
Washington, DC 20590

Dear Sirs:

Regarding Docket No. NHTSA-2019-0085, regarding Federal Motor Vehicle Safety Standard No. 141, Minimum Sound Requirements for Hybrid and Electric Vehicles, please consider that requiring only electric vehicles to make noise to alert pedestrians would shortchange the safety of pedestrians, if indeed vehicle noise is genuinely a safety issue, and considering that so many Internal Combustion Engine powered vehicles are also very quiet. Manufacturers of Internal Combustion Engine cars should also be required to do the same sound testing at slow speeds as electric vehicle manufacturers to determine if it needs additional noise making.

All noise-making requirements that apply to Electric Vehicles should also apply to all other vehicles regardless of their means of propulsion.

If noise makers are deemed to be necessary for safety, then pedestrians deserve to be kept safe from quiet Diesel and/or gasoline fueled vehicles as well as from electric battery powered vehicles.

That being said, sounds should be contingent on the presence of pedestrian(s) and directional sound should be allowed in order to avoid unnecessary noise pollution.

Pedestrian safety seems to be well handled by normal driver/pedestrian awareness and the ever-increasing presence of Auto Emergency Braking which is quite effective at the speeds contemplated for noisemakers.

Thank you,

Ned Wulin