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November 1, 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 Seeing Eye,, Inc. 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 (HEV's). For over 90 years, The Seeing Eye has been matching people who are blind or have low vision with scientifically bred dogs in order to foster greater independence and dignity. Seeing Eye® dogs are responsible for guiding people safely around obstacles and across streets, and we remain steadfastly committed to supporting legislation that promotes that safe travel.

We stand by our public comment in response to NHTSA's January 2013 NPRM. We asserted that, for recognition purposes, it is important that all vehicles emit the same standardized sound regardless of manufacturer. That said, we understand that NHTSA may decide to amend FMVSS 141 to permit HEV manufacturers to offer drivers a suite of selectable sounds for each operating condition.

In the event that NHTSA amends FMVSS No. 141 as proposed, , we strongly urge the agency to establish a clear requirement that manufacturers offer only sounds that would be recognizable as those emitted by a motor vehicle that could potentially pose a safety risk to pedestrians. We recognize that NHTSA is making an effort to consider the interests of multiple constituencies affected by the Minimum Sound Requirements. However, it is our position that the NHTSA must act in a manner that is in keeping with the Pedestrian Safety Enhancement Act of 2010 (PSEA), which resulted in the promulgation of FMVSS No. 141. The NPRM acknowledges that the PSEA "included language that placed constraints on the

multitude of different HEV pedestrian alert sounds that are possible. ... The PSEA further stated that NHTSA must require that vehicles of the same make and model produce the same sound or set of sounds, which would result in all similar vehicles having a similar sound in a given operating condition (forward, reverse, etc.).”

A lack of clear limitations on the types of sounds selectable by drivers could place a greater cognitive burden on pedestrians who must rely exclusively on vehicle sounds to interpret traffic patterns and use that information to make judgments that affect their safety. In fact, the NPRM references a March 1, 2017 letter submitted by Alliance/Global to supplement their Petition for Reconsideration. In their letter, Alliance/Global raised the issue that the “variety of alert sounds that manufacturers can create that comply with the safety standard is virtually unlimited due to the acoustic flexibility provided by the requirements in FMVSS No. 141.” Alliance/Global went on to recommend a limit of 5 sounds per vehicle. However, limiting the number of sounds a manufacturer can make available is not enough. This restriction alone would do nothing to limit the type of sounds a manufacturer could offer that are compliant but do not sound like a vehicle. Clearer specifications for the types of sounds selectable by drivers are necessary in order to avoid undermining the PSEA and jeopardizing the safety of the pedestrians it was designed to protect.

Thank you once again for your consideration of our comments. Please feel free to contact us if you have any questions or need clarification.

Respectfully submitted,

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The Seeing Eye, Inc.