



Commercial Vehicle Safety Alliance

Improving uniformity in commercial motor vehicle safety and enforcement

December 3, 2019

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Room W12-140
Washington, DC 20590

RE: Docket Comments: Docket Number NHTSA-2018-0021
Federal Motor Vehicle Safety Standard No. 111, Rear Visibility

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments regarding the advance notice of proposed rulemaking (ANPRM) related to the use of camera-based rear visibility systems, docket number NHTSA-2018-0021.

CVSA is a nonprofit association comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to achieve uniformity, compatibility and reciprocity of commercial motor vehicle inspections and enforcement by certified inspectors dedicated to driver and vehicle safety. Our mission is to improve commercial motor vehicle safety and uniformity throughout Canada, Mexico and the United States, by providing guidance and education to enforcement, industry and policy makers.

CVSA is supportive of the deployment of proven safety technologies and commends the National Highway Traffic Safety Administration (NHTSA) for soliciting public comments on camera-based rear visibility systems, as more information is needed to determine if they provide enhanced safety benefits. Specifically, the Alliance supports NHTSA's efforts to conduct research on commercial motor vehicles and evaluate the potential safety benefits as they have unique and significant visibility challenges caused by the size of the vehicles. As NHTSA continues to examine the potential benefits of camera-based rear visibility systems, CVSA encourages the agency to exercise caution, as there are safety concerns that need to be evaluated and addressed before moving ahead with a rulemaking.

General Comments

While CVSA recognizes there may be potential safety benefits of the proposed technology, there are several areas of concern regarding this technology that NHTSA should consider when conducting its research.

- Currently, mirrors meeting or exceeding the required Federal Motor Vehicle Safety Standard (FMVSS) No. 111 specifications are often used by roadside inspectors and law enforcement officers to see what is happening inside the cab. For example, law enforcement officials use the mirrors to identify when commercial motor vehicle drivers are operating a vehicle in an unsafe manner, such as using a handheld device while driving or not wearing a safety belt. Without traditional exterior mirrors, current enforcement methods to enforcing the rules of the road and the various safety regulations may be affected.

- Similarly, roadside inspectors use the mirrors to visually communicate with commercial motor vehicle drivers during roadside inspections. For example, inspectors need to communicate with a driver while checking lighting requirements and make sure that a driver knows when the inspector begins to crawl under a truck as part of a roadside inspection. In addition, the inspector can see whether the driver has remained in the driver's seat during an inspection, a safety concern for inspectors.
- Vehicle width laws, both federal and state, often provide for allowances or exceptions for certain safety equipment, particularly mirrors. Consideration must be given to whether camera-based rear visibility systems or their components would also be excluded from such laws and regulations. Uniformly defining the relevant components will ensure that enforcement of width laws is consistent.
- Safety and enforceability in cases where a camera-based rear visibility system has stopped functioning in a commercial motor vehicle needs considered. Any rule that NHTSA promulgates needs to establish minimum reliability standards that are also enforceable at roadside through, for example, an amended Federal Motor Carrier Safety Regulation § 393.80.

Responses to Questions in the Notice

NHTSA Request for Comment: Question 4. NHTSA seeks comments on the minimum field of vision requirements for camera-based systems.

CVSA Response: A portion of the safety concerns for roadside inspectors described above could be addressed if these systems are required to provide an increased field of vision. An increased field of vision could increase a driver's awareness of the location of a roadside inspector during the inspection process.

NHTSA Request for Comment: Question 20. NHTSA seeks comments on additional safety concerns that are related to the use of camera-based rear visibility systems.

CVSA Response: NHTSA should consider the safety impacts of this technology in the context of roadside enforcement and inspection. As noted above, traditional mirrors are utilized to enforce safety regulations like the required use of a safety belt and play a key role in ensuring inspector safety during roadside inspections. NHTSA should consider these potential safety impacts in this context before moving forward with a rulemaking.

CVSA works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the opportunity to comment on this proposal and the agency's commitment to safety and stakeholder involvement.

If you have further questions or comments, please do not hesitate to contact me by phone at 301-830-6149 or by email at collinm@cvsa.org.

Respectfully,



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