

DEPARTMENT OF TRANSPORTATION

NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

**Docket No. NHTSA-2018-0021: Federal Motor Vehicle Safety Standard No. 111, Rear Visibility;
Advance Notice of Proposed Rulemaking**

COMMENTS OF GREYHOUND LINES, INC.

December 9, 2019

Greyhound Lines, Inc., operator of the Nation's only nationwide intercity bus network, strongly supports NHTSA's authorizing the use of Camera Monitoring Systems (CMS) as an alternative to rear view mirrors for the purpose of meeting the rear visibility requirements of FMVSS No. 111. Greyhound believes that the use of CMS as an alternative to mirrors has the potential to substantially improve the safe operation of over-the-road buses (OTRBs) and applauds NHTSA's promulgation of this ANPRM, which starts the formal process of recognizing CMS as an alternative method of compliance with FMVSS No. 111.

In the ANPRM, NHTSA refers repeatedly to the proceeding as applying to light and heavy vehicles. It is important for NHTSA to clarify that "heavy vehicles" include OTRBs.¹ In its companion proceeding, NHTSA-2019-0082, NHTSA announced that it was collecting information about drivers' usage of CMS on light vehicles and "heavy trucks". Greyhound filed responsive comments urging NHTSA to broaden its information collection activities to include OTRBs.

Greyhound argued that the safety benefits of CMS on buses were potentially as great, if not greater, than on trucks because buses carry people, not freight. Greyhound also noted that because so much of its operations are conducted in congested urban environments, accidents involving bus mirrors striking a foreign object are the most frequent Greyhound accidents and asserted its belief that the same is true of most other bus companies. CMS as an alternative to mirrors could lead to a substantial reduction in bus accidents.

Given the disparity between the terms "heavy trucks" in NHTSA-2019-0082 and "heavy vehicles" in this ANPRM proceeding, Greyhound urges NHTSA to clarify that the ANPRM is intended to include OTRBs and that the supporting information collection activities will also include OTRBs.

¹ "Over the road bus" is statutorily defined as "a bus characterized by an elevated passenger deck located over a baggage compartment". 42 USC §12181(5). The term tends to be interchangeable with "intercity bus".

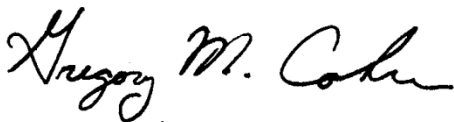
Because of the unique potential benefits of CMS to OTRBs, Greyhound has worked with bus manufacturers to install and test CMS on buses. Greyhound demonstrated the use of these systems to NHTSA personnel recently in Washington, DC. Greyhound provided a display bus at the DOT Headquarters that was equipped with rear view cameras. The presentation was met with great enthusiasm by USDOT officials and NHTSA staff, who were able to see firsthand the increased visibility provided.

The bus was equipped with rear view mirrors, in addition to the cameras, which provided a contrast in the viewing area provided by both. It was unmistakable how vastly superior the camera visibility area was over the use of rearview mirrors. The system utilizes four rear-view cameras and two display screens. The field of view of this system is far greater than the legacy mirrors both in convex and standard flat configurations, thereby providing the driver a greater awareness of potentially hazardous targets. This increased field of vision allows for better reaction time to move the bus from harm's way.

Additionally, it was noted that the rearview cameras work more effectively than mirrors at night and in other sub-optimal conditions. Technologies in these cameras include integrated night vision enhancing technology combined with glare reduction (both during night and day), higher resolution projected imaging (vibration isolated for diminished bouncing images), and special camera glass treatments with water-shedding technology and heat that eliminate the problem of icing and fogging that can seriously reduce the effectiveness of traditional mirrors.

Greyhound will continue to provide technical input with regard to CMS on OTRBs and looks forward to participating in NHTSA's information collection activities concerning driver CMS usage. Greyhound sees great safety benefits for the use of CMS on buses and urges NHTSA to move forward expeditiously to authorize CMS as an alternative to rear view mirrors on OTRBs.

Respectfully Submitted,

A handwritten signature in black ink that reads "Gregory M. Cohen". The signature is written in a cursive, flowing style.

Gregory Cohen
Government Affairs Representative
Greyhound Lines, Inc.