



**AUTO ALLIANCE**  

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**DRIVING INNOVATION®**



December 10, 2019

Mr. James Owens, Esq.  
Acting Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE,  
Washington, DC 20590-0001

**Re.: Advanced Driver Assistance Systems Draft Research Test Procedures; Request for Extension of Comment Period**

**Ref.: 84 Fed. Reg. 64405; Docket No. NHTSA-2019-0102**

Dear Acting Administrator Owens:

The Alliance of Automobile Manufacturers (“Alliance”) and the Association of Global Automakers, Inc. (“Global Automakers”) respectfully requests a 45-day extension of the Comment Due date for the above referenced Request for Comment (“RFC”) seeking public input on a series nine draft research test procedures developed by the National Highway Traffic Safety Administration (“NHTSA” or “the agency”) to assess the performance of certain types of Advanced Driver Assistance Systems (“ADAS”). Comments are currently due no later than January 21, 2020.

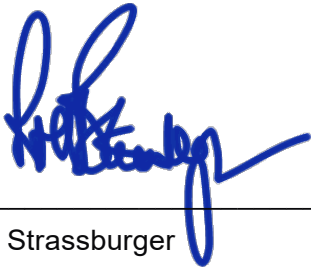
The Alliance and Global Automakers appreciates the opportunity to provide comment on draft ADAS research test procedures. However, more time is needed to fully respond to the questions posed for each of the nine different ADAS technologies. Given the breadth of technologies included in the RFC, the process for providing feedback is much more complex due to the different engineering teams that need to be engaged within each company. It will therefore take more time to develop complete responses that appropriately incorporate input from multiple industry experts within each company. This notwithstanding the impact of national year–end holidays during which many member companies have long–scheduled shutdowns.

To the extent public input provided in response to the RFC will inform the agency on its next steps regarding NCAP, we believe that providing additional time for public review and comment will help better inform any future agency actions regarding the use of these test procedures.

Therefore, to help better ensure a more comprehensive industry response to the RFC, we respectfully request that the agency please extend the comment deadline to **March 6, 2020**.

Please let us know if you have any questions.

Sincerely,



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Robert Strassburger

*Vice President, Vehicle Safety and Harmonization*

Alliance of Automobile Manufacturers



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Steve Gehring

*Vice President, Vehicle Safety and Connected Automation*

Association of Global Automakers, Inc.