

January 15, 2020

National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Gentlemen:

Thanks for the opportunity to provide comments on NHTSA's, "Advanced Driver Assistance Systems Draft Research Test Procedures", Docketlet 2019-0102-0011.

We are disappointed that NHTSA has not emphasized the detection of bicyclists and pedestrians in your testing criteria for automated braking technology. We feel adoption of these proposed testing protocols may be a lost opportunity that will ultimately result in needless injuries and deaths over the next decade or longer.

According to *NHTSA's own data*, in 2018 there was a 3.4% year over year increase in pedestrian fatalities and a 6.3% increase in cyclists fatalities. This is an alarming trend as we see more people choosing to shift mode share from traveling in single occupancy automobiles to biking, walking or use mass transit.

Existing technology in cars today can detect and brake for vulnerable road users. Since April, 2018, European NCAP has required detection and emergency braking for bicycles and pedestrians in their testing protocol to receive a top safety ratings. The fact that NHTSA is not including comprehensive testing criteria in your protocols seems counterintuitive. Historically, the US - NHTSA and USDOT - have set the standard in making cars safer with requirements for seatbelts, electronic stability control, rear cameras, etc. We find it concerning that Europe now seems to be taking a leadership role in raising the safety bar.

As we move towards the day of fully automated vehicles, adopting best technology and prioritizing the safety of vulnerable road users must be a priority. We urge NHTSA to revise the proposed testing criteria to at least match EuroNCAP standards to detect bicyclists and pedestrians.

Sincerely,

Champe Burnley,
President



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