



March 6, 2020

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

Submitted via internet

department: BC
extension: 2732
contact: Pascale Reyntjens
our reference: 20017

**Advanced Driver Assistance Systems Draft Research Test Procedures
84 FR 64405; Docket No. NHTSA-2019-0102**

Dear Sir:

Van Hool N.V. appreciates the opportunity to submit comments on the RFC for Advanced Driver Assistance Systems Draft Research Test Procedures, and the Test Track Procedures for Heavy-Vehicle Forward Collision Warning and Automatic Emergency Braking Systems in particular.

As a European based manufacturer of over-the-road coaches for the US, Van Hool feels that it is qualified to provide NHTSA with comments given its experience with both the European and UN Regulations, as well as the Federal Motor Vehicle Safety Standards. This knowledge enables Van Hool to compare both of them.


In 2009 the European Union passed the General Safety Regulation which required Automatic Emergency Braking System on all Heavy Duty Vehicles from November 1, 2015 forward by Regulation (EC) 347/2012. In the meantime also the UN Regulation No. 131 was published.

Enclosed to this letter you'll find the questions and remarks from our dedicated engineers based on their experience with test procedures from both Regulations.

Yours sincerely,
Van Hool N.V.



Hugo De Roo
Area Export Manager



Pascale Reyntjens
Chief Compliance and Regulations

Enclosure

1. Why so many tests ?
To test every situation 7 times successfully means at least 112 tests in total. In our opinion three successful tests will also be representative.
2. What are the requirements for the principal other vehicle (POV) (target)?
In Europe this is defined as follows : "'Target" means a high volume series production passenger car of category M1 AA saloon1 or in the case of a soft target an object representative of such a vehicle in terms of its detection characteristics applicable to the sensor system of the AEBS under test."
3. A more specific description of the POV will prevent discussions.
4. What is the use of the accelerator pedal force?
It isn't used in the test descriptions.
5. In the stopped lead vehicle test a stopped POV is mentioned but on the schematic view of the test a stationary vehicle is shown. For a radar there is a difference between a stationary and stopped target.
6. Why testing false reaction on steel trench plate?
7. The test to determine a brake pedal position that ensures an acceleration of -3m/s^2 . Why is it necessary to have an acceleration of -3m/s^2 ?
8. Dynamic Brake Support (DBS) Tests. Could these test not be replaced by one ?
9. If test shows that system will applied the brakes more than the driver when necessary in any situation it will work in every situation.