



March 6, 2020

*By regulations.gov*

National Highway Traffic Safety Administration (NHTSA)  
Docket Management Facility  
West Building, Room W12-140  
1200 New Jersey Avenue, SE  
Washington, DC 20590-0001

Re: Advanced Driver Assistance Systems Draft Research  
Test Procedures; Doc. No. NHTSA–2019–0102

Ladies and Gentlemen:

The National Automobile Dealers Association (NADA) represents more than 16,000 franchised automobile and truck dealers who sell new and used motor vehicles and engage in service, repair and parts sales. Together they employ over 1,100,000 people nationwide, yet the majority are small businesses as defined by the Small Business Administration.

Last year, NHTSA sought comment on whether draft research test procedures for nine Advanced Driver Assistance Systems (ADAS) will adequately, objectively, and practically assess their performance.<sup>1</sup> Franchised dealerships sell and service new and used light-duty and commercial vehicles equipped with these ADAS features, but they do not design, manufacture, test, or validate them. Nonetheless, NADA offers the following comments and suggestions.

#### I. The Consistent Use of Uniform ADAS Nomenclature and Acronyms

Along with NHTSA and many other stakeholders, NADA recognizes that customers can become confused or concerned about the functionality, proper use, and limitations of ADAS features. At worst, such confusion or concern may result in decisions to avoid certain ADAS features when making new or used vehicle purchases. In addition, owners of ADAS-equipped new or used vehicles may over-rely on, turn off, or disable features if confused or concerned about their performance. At bottom, customer confusion and concern can undermine the potential of ADAS to decrease road crashes, injuries and deaths. Moreover, the misuse of, or overreliance on, ADAS features may even lead to road crashes that would not have otherwise occurred.

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<sup>1</sup> 84 Fed. Reg. 64405-6 (November 21, 2019). These ADAS features include light-duty vehicles: Active Parking Assist, Blind Spot Detection, Blind Spot Intervention, Intersection Safety Assist, Opposing Traffic Safety Assist, Pedestrian Automatic Emergency Braking, Rear Automatic Braking, and Traffic Jam Assist and for heavy-duty vehicles: Forward Collision Warning and Automatic Emergency Braking.

Thus, NADA has actively engaged with the National Safety Council (NSC) on its *My Car Does What* campaign, with the Partners for Automated Vehicle Education on its public outreach efforts, and with the Society of Automobile Engineers and the National Association of Mutual Insurance Companies on their ADAS and automated vehicle terminology and communication work. NADA also recently published a *Dealer Guide to High-Tech Vehicle Safety* and hosted a session on customer ADAS communication at its 2020 national convention.

At the heart of the ADAS communication challenge is the fact that there exists a wide variety of ADAS features labelled with a wide variety of differing trade names. Fortunately, efforts are underway to help promote harmonization and uniformity. For example, *Clearing the Confusion*, a one-pager jointly issued by the NSC, the American Automobile Association, J.D. Power, and Consumer Reports, lists recommended ADAS terminology based on feature functionality. It stresses throughout that ADAS features are designed to assist, not replace, engaged drivers. In January 2020, the U.S. Department of Transportation (DOT) endorsed the standardized listing of recommended ADAS terminology set out in *Clearing the Confusion*.

The ADAS terminology NHTSA uses for its draft research test procedures do not line up with those laid out in the *Clearing the Confusion* one-pager. To help promote uniformity and reduce consumer confusion, NADA urges NHTSA to revise the ADAS terms it will use for its draft test procedures to conform with those set out in *Clearing the Confusion*.

## II. The Consistent Use of Uniform ADAS Display Symbols

In addition to the terminology used to describe ADAS features, there is a need for better communication regarding the visual dashboard display symbols used to represent those features. This is another area where uniformity and harmonization are essential. Also critical is the need for adequate human factor testing to ensure that visual dashboard display symbols can be easily understood by human drivers to indicate the ADAS features they represent. Any driver confusion or lack of knowledge regarding visual dashboard display symbols could translate into misunderstandings as to which ADAS features are being referenced, and whether they are operational and are performing as designed.

## II. Minimum ADAS Performance Standards

NADA is encouraged by NHTSA's plan to conduct research-oriented testing of ADAS features. It is NADA's position that NHTSA's research testing will lead to the development and adoption of minimum ADAS performance standards, and that such standards will help foster public confidence in the safety efficacy of ADAS features. The Insurance Institute for Highway Safety has conducted tests indicating that for any given ADAS feature, performance can vary significantly by manufacturer and by vehicle model. NADA appreciates the degree to which standardized test conditions are key to vehicle model comparisons. However, in order to better assess system performance against a minimum threshold, real world driving conditions and scenarios should be incorporated, as appropriate.

### III. Listing ADAS Features on Monroney Labels Will Enhance Consumer Awareness

Safety sells and new, high-tech safety features can be strong marketing points for attracting new customers. According to data from Strategic Vision's *2019 New Vehicle Experience Study*, 81 percent of all new light-duty vehicle buyers in 2019 ranked vehicle safety features as one of the top two reasons for choosing the vehicle they bought. Moreover, NADA has long recognized the value of easily understood point-of-sale safety information, including on ADAS features.

In 2015, the Fixing America's Surface Transportation Act (FAST Act) mandated that NHTSA conduct a rulemaking on the display of crash avoidance information on the Monroney labels of new motor vehicles.<sup>2</sup> Also in 2015, NHTSA issued a proposal to include crash avoidance technologies (including ADAS) in its New Car Assessment Program (NCAP).<sup>3</sup> In 2018, NHTSA requested further comment on an expansion of NCAP, has yet to issue a formal proposal since then.<sup>4</sup> NADA urges NHTSA to move forward with a requirement to include ADAS features information in its NCAP program and on NCAP labels.

### IV. Conclusion

On behalf of NADA, I thank NHTSA for the opportunity to comment on this matter.

Respectfully submitted,



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<sup>2</sup> Public Law 114-94.

<sup>3</sup> 80 Fed. Reg. 78522, *et seq.* (December 16, 2015).

<sup>4</sup> 83 Fed. Reg. 38201, *et seq.*, (August 3, 2018).