

FEDERAL REGISTER Document Number: 2020-02332

Summary: Comments that will Ensure American Leadership in Automated Vehicle Technologies with Procedures to Adequately and Objectively Assess Performance of Crash Protection and Collision Avoidance Systems that Inspire Leading Automated Vehicle Road Safety Innovation

Agency: Department Of Transportation

Agency Docket: DOT-OST-2019-0179

Date Posted: February 6, 2020

Action:

Request for Comments

Action Reply: Comments

Date Submitted: March 17, 2020

Comments Submitted By:

David DeVeau

DEVCO Design & Development

Westfield, MA 01085

Attachments: (File Name)

DOT_Safety-Rating-State-Enforcement_David-DeVeau.pdf

Title-49-USC-32302_Vehicle-Information-Amendments_David-DeVeau.pdf

Title-49-USC-571.208_Airbag-Design-Amendments_David-DeVeau.pdf

Title-49-USC-571.102_Transmission-Shift-Amendments_David-DeVeau.pdf

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U.S. Government Road Vehicle Technology Principles Addressed:

- Prioritize Safety
- Remain Technology Neutral
- Modernize Regulations
- Promote Consistent Standards and Policies
- Ensure a Consistent Federal Approach
- Improve Transportation System-Level Effects

Further:

- Inspires Fair Competitive Safety Innovation and Creativity
- Clarifies Crashworthiness and Crash Avoidance Technology
- Enforces Independent Certification of Safety Feature Design
- Ensures Clear Testing Criteria and Consumer Safety Rating
- Enables Safety Recall Priority and Completion Status
- Empowers States to Enforce Safety Feature Compliance



The Clearer Safety Is The Safer We Become

Introductory of References:

We all want to be safe when we move among others especially in high speed transportation and we all support higher safety expectations at higher speeds.

These references include related submittals to the NHTSA via the Federal Register and amendments to existing laws that update our safety ability.

2020 DEVCO Commuter Coupe				2 Seat Sport
Crash / Collision Safety Ratings- (Standard or Regulated / Optional / Other Colors)				
	Protection	Avoidance		Safety Features
105mph ★				Drive Paddle Shift
95mph ★	Front Center-3/4			Separable Safety Cage
85mph ★		Front Collision Warning	Side Lane Departure Warning	Hi-Speed Warnings
75mph ★	Front 1/2-1/4	Rear Center-3/4	Front Brake Stop Assist	
65mph ★	Side Center-3/4	Rear 1/2-1/4	Front Driver Speed Assist	Travel Congested Highways ?
55mph ★				Automatic Hi/Low Beam
45mph ★		Front / Side Traction Automatic		
35mph ★		Front Brake Stop Automatic	Front Traffic Automatic	Is Your Commute Stop & Go ?
25mph ★			Front Pedestrian Warning	Front Seatbelt Airbag
15mph ★	Rear Pedestrian	Front Pedestrian	Rear Brake Stop Automatic	Parking Assist
National Highway Traffic Safety Administration (NHTSA) Crash / Collision Tests Are Under Laboratory Conditions At Speed Indicated +/- 4mph Crash Protection For Passengers In All Seat Locations At 100% Survival Collision Avoidance Technology Has 100% Proof Of Function Actual Crash / Collision Conditions Are Simulated Within 80% For Additional Information Go To www.SaferCar.gov				SILVER 55+ Years BLUE Family Needs GOLD Performance

New Road Vehicle Safety Feature Rating

Summary:

The clearest way to measure transportation performance and to rate crash protection and collision avoidance safety will always be at speed.

References:

Federal Document Number: 2019-25217

Docket Number: NHTSA-2019-0102

Summary: Procedures to Adequately and Objectively Assess
Performance of Crash Protection and Collision Avoidance Systems
Public Submission Posted: 01/15/2020 ID: NHTSA-2019-0102-0019

Organization: DEVCO Design & Development

Submitter Name: David DeVeau

References: (Continued)

Federal Document Number: 2018-16653

Docket Number: NHTSA-2018-0055

Summary: New Car Assessment Program 10 Star Speed Safety Rating System with Year Make Model Safety Sticker Design Summary

Public Submission Posted: 11/26/2018 ID: NHTSA-2018-0055-0074

Organization: DEVCO Design & Development

Submitter Name: David DeVeau

Federal Document Number: 2018-16653

Docket Number: NHTSA-2018-0055

Summary: New Car Assessment Program 10 Star Speed Safety Rating System Updated Comments After Speeches

Public Submission Posted: 10/11/2018 ID: NHTSA-2018-0055-0011

Organization: DEVCO Design & Development

Submitter Name: David DeVeau

Federal Document Number: 2018-16653

Docket Number: NHTSA-2018-0055

Summary: New Car Assessment Program 10 Star Speed Safety Rating System with Year Make Model Safety Stickers

Public Submission Posted: 09/10/2018 ID: NHTSA-2018-0055-0005

Organization: DEVCO Design & Development

Submitter Name: David DeVeau



Enforced Road Vehicle Safety Worthiness

Summary:

The clearest way to ensure continued transportation performance and safety compliance is with a federally regulated state inspection.

References:

Federal Document Number: 2019-18705

Docket Number: NHTSA-2019-0027

Summary: State Notification to Consumers of Motor Vehicle Safety
Feature Recall Priority and Completion Status

Public Submission Posted: 09/04/2019 ID: NHTSA-2019-0027-0008

Organization: DEVCO Design & Development

Submitter Name: David DeVeau

Summary:

The main point in all this is that Self-Certified Safety Features Do Not Assure Public Safety.

Independent testing of all types and levels of safety features is very expensive and must be paid for by the manufacturer, not the taxpayer.

The registered vehicle must continue to be monitored for performance and safety feature compliance by independent inspection stations for a small fee.

Consumers must have a clear way to compare new vehicle safety and states must have a clear way to ensure public safety to include safety recalls that will automatically notify the federal regulators of recall completion status for every new and used registered road vehicle.

Clearly this is a complete sticker system that will inspire to lead increased safety innovations for new vehicles with assurance of continued safety throughout the life cycle of all road vehicles and greatly simplifies federal and state regulatory oversight as well will even boost national job growth.

Sometime it is the simplest solution that answers all the complicated questions.

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