

## Comment from Morgan Carter

As our nation moves forward towards widespread use of innovative products, such as autonomous vehicles, shrewd legislation that balances the desire for technological advancements and the need for a safe environment becomes vital. I support the National Highway Traffic Safety Administration's (NHTSA) decision to update their current crashworthiness (200 series) Federal Motor Vehicle Safety Standards (FMVSS) for Automated Driving Systems (ADS) for cars that are traditionally configured in all aspects, except their manual controls. These updates are necessary because the nature and effects of a car crash dramatically change for the driver when there is no steering wheel or steering column in the vehicle.

Regarding the additions proposed to FMVSS No. 208 on occupant crash protection, I think that it is necessary for NHTSA to require passenger (for children and adults) advanced air bags requirements for the driver's seat of front outboard seats in an ADS equipped vehicle. Even though NHTSA guidance currently states that children under the age of 13 should be seated in rear seats, and NHTSA says this guidance is likely to stay in place for the foreseeable future, children could still potentially be seated in the front seat of ADS equipped vehicles because it is not necessary to have a driver. Also within FMVSS No. 208, I think it is a good idea for NHTSA to require ADS equipped vehicles to be incapable of motion if a child is detected in driver's seat, using a testing verification system that suppresses motion "when a 12-month-old CRABI dummy is placed in the driver's seating position and the vehicle is in an operational state that does not require a driver." While this test would not be enough to protect older children, it is a good first step towards developing child friendly front outboard passenger seats. It is proactive for NHTSA to think of possible future situations such as these, and regulate accordingly to protect our nation's children.