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Federal Register NPRM: **DUE MAY 29, 2020;**
Occupant Protection for Automated Driving Systems

Re: National Highway Traffic Safety Administration (Docket no: NHTSA-2020-0014) RIN 2127-AM06

April 30, 2020

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

Dear Administrator Owens:

Safe Kids Worldwide appreciates this opportunity to comment on the Occupant Protection for Automated Driving Systems NPRM NHTSA-2020-0014. This NPRM is focused on adult occupant protection with a few questions referencing children as occupants in autonomous vehicles. Clearly, it will be necessary for National Highway Traffic Safety Administration (NHTSA) to undertake a similar rulemaking for child occupants since this very important aspect of safety is not considered in this NPRM. Safe Kids Worldwide has a compelling interest in ensuring the varied needs of child occupants in automated driving systems and the questions below are considered based on the recommendations and calls to action from our 2018 *Children in Autonomous Vehicles Blue Ribbon Panel*. Please clarify when child occupant protection will be covered in a future rulemaking.

Given that there are some references to child occupant protection in this NPRM, it is critical that the following terms be defined:

- What is NHTSA's definition of a "child"?
- What is the minimum age that an unattended child can ride in an autonomous vehicle?
- How is each seating position in an autonomous vehicle to be evaluated and determined to be safe and appropriate for child occupants?
- What is the airbag design for each seating position and how does it relate to child occupants?
- What uniform national crash reporting system will be in place to collect crash data for child occupants involved in autonomous vehicle crashes?

In terms of first responders and their safety when approaching an autonomous vehicle:

- Since occupant protection is a critical focus in a crash, how will first responders know what technology exists in a vehicle as they gain entry into a vehicle?



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- How will first responders know what upgrades may have been added to the vehicle beyond the point of purchase information included on the VIN?

In terms of school buses and seat belt types included in autonomous school buses that carry child occupants:

- National Transportation Safety Board (NTSB) crash investigations have shown the life-saving value of Type 2 seat belts for all school bus occupants, not just the driver. How will NHTSA apply these findings and NTSB recommendations to enhance the level of safety for child occupants on school buses?

This NPRM represents a significant opportunity to enhance safety for autonomous vehicles. Children are among the most vulnerable occupants in vehicles and their safety should be paramount in any effort to address crashworthiness in autonomous vehicles. A copy of the Safe Kids Worldwide *Children in Autonomous Vehicles Blue Ribbon Panel* report can be obtained at www.safekids.org/kids-autonomous-vehicles.

Thank you again for this opportunity to comment.

Sincerely,

Torine Creppy
President

