



May 29, 2020

The Honorable James Owens
Acting Administrator
National Highway and Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Docket No. NHTSA-2020-0014. FR Doc. 2020-05886. Notice of Comments: Occupant Protection for Automated Driving Systems

Dear Acting Administrator Owens:

The Association for Unmanned Vehicle Systems International (AUVSI) appreciates the opportunity to submit comments on Docket No. NHTSA-2020-0014. This series of regulatory actions is critical to the advancement of automated vehicle (AV) technology.

AUVSI is the world's largest nonprofit organization dedicated to the advancement of unmanned systems and robotics. The association represents corporations and professionals from more than 60 countries involved in autonomous systems spanning the ground, air, and maritime domains.

The proposed changes will lay the foundation for future modernization efforts for AVs to match the available technology. They also will eliminate or reconfigure traditional parts and components, such as steering controls and seating systems while maintaining crashworthiness. We support the approach NHTSA is taking that will lead to improving vehicle design features and expanding advanced automated driving systems (ADS) to enhance passenger safety.

We agree with the proposed amendments on the 11 FMVSS definitions NHTSA is reviewing: No. 201 (Occupant protection in interior impact), No. 203 (Impact Protection for the driver from the steering control system), No. 204 (Steering Control rearward displacement), No. 205 (Glazing materials), No. 206 (Door locks and door retention components), No. 207 (Seating Systems), No. 208 (Occupant Crash Protection), No. 214 (Side Impact protection), No. 216a (Roof crush resistance; upgraded standard), No. 225 (child restraint anchorage systems), No. 226 (Ejection mitigation).¹

As AUVSI has stated in previous comments to the U.S. Department of Transportation (USDOT), adoption of technology neutral regulations and laws is critical to enable the scalability of ADS with the appropriate balance between state and federal lawmaking.²

AUVSI further encourages the agency to conduct a similar examination and modernization of safety regulations concerning heavier vehicles equipped with ADS, especially trucks that are used to transport freight. In 2018, there were nearly 5,000 fatalities across the United States in accidents involving commercial trucks, with more than 90

¹ "Occupant Protection for Automated Driving Systems, A Proposed Rule by the National Highway Traffic Safety Administration," NHTSA, March 30, 2020, <https://www.federalregister.gov/documents/2020/03/30/2020-05886/occupant-protection-for-automated-driving-systems>

² "Preparing for the Future of Transportation: Automated Vehicles 3.0," Comments by AUVSI, Dec. 3, 2018, <https://www.regulations.gov/document?D=DOT-OST-2018-0149-0078>

percent caused by human error.³ Federal guidance on vehicle designs and systems that enhance safety and encourage the deployment of autonomous trucks could save many thousands of lives on America's roads.

In addition to the proven safety gains outlined above, autonomous trucks have the potential to move cargo more efficiently with shorter AI-calculated routing. These savings can be passed along to the shipper and, ultimately, to the consumer. The recent changes to the Hours of Service (HOS) for Commercial Motor Vehicle (CMV) drivers by USDOT will allow for more flexibility on how trucks transport essential goods around the country.⁵ This is a crucial step to allowing for automated and driverless trucks to operate longer and further, including at night when there is less traffic, as the technology becomes more widely adopted.

Thank you for considering AUVSI's views on this proposed rulemaking and our request to review and update regulations of protection designs for trucks. We welcome the opportunity to collaborate with NHTSA as this process moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian P. Wynne", with a long horizontal flourish extending to the right.

Brian Wynne
President and CEO

³ "2018 Fatal Motor Vehicle Crashes: Overview," NHTSA's National Center for Statistics and Analysis, October 2019, <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812826>

⁴ "U.S. Department of Transportation Modernizes Hours of Service Rules to Improve Safety and Increase Flexibility for America's Truckers," USDOT, May 14, 2020, <https://www.transportation.gov/briefing-room/us-department-transportation-modernizes-hours-service-rules-improve-safety-and>