

Comment from Kyle Mertens

The changes in legislation for Automated Driving Systems has been an increasingly critical area for vehicle manufacturers. ADS systems are becoming more and more integrated into the modern vehicles we drive today. The treatment of ADS vehicles must change to make way for innovation in the automobile industry. The National Traffic and Motor Vehicle Safety Act has restricted ADS equipped vehicles as this document was created prior to the rise in ADS technology; it is becoming increasingly outdated. The rules set in place by this act are well overdue for change and the list is quite large. Vehicles have evolved so much in such a short time period. Safety concerns need to be addressed for modern ADS vehicles by the NHTSA. The proposed changes will remove barriers for ADS vehicles to advance without the need for numerous exemptions. Updates in crashworthiness will be redefined in the Federal Motor Vehicle Safety Standards because the nature of car accidents will change.

The “driver” or “driver’s seat position” is a common reference to the forward seat that has immediate access to the manual controls of a vehicle. Emerging vehicles with non-traditional manual controls or limited manual controlling will have to be included into the safety certification of traffic vehicles. The advanced airbag systems are a critical part of legislation that would require these new vehicles to continue the use of these safety requirements. Although children should be sat in the rear seats of a vehicle, the front seating should still have advanced airbag systems that can detect that a child is sitting in the front row area. The designated driver seats should continue to not be a place for any child under the age of 13. My concern is the insurance situation for a driverless vehicle that is at fault in a given situation. Murphy’s Law would suggest that a driverless car however good it may be in crash mitigation, could be at fault in an accident. This brings up the question of who is at fault, the person who owns the vehicle or is the manufacturer liable for any damages? Finally, these vehicles with advanced ADS could transition to a place where they have very little manual controls or any at all. Unconventional interior designs and lack of controls for a human entity will have to be acknowledged for the future.