



September 21, 2020

By regulations.gov

National Highway Traffic Safety Administration (NHTSA)
Docket Management Facility
West Building, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: Agency Information Collection Activities; Proposals,
Submissions, and Approvals: Driver Interactions with Advanced
Driver Assistance Technologies; Doc. No. NHTSA-2019-0037

Ladies and Gentlemen:

The National Automobile Dealers Association (NADA) represents more than 16,000 franchised automobile and truck dealers who sell new and used motor vehicles and engage in service, repair and parts sales. Together they employ over 1,000,000 people nationwide, yet the majority are small businesses as defined by the Small Business Administration.

NHTSA is conducting a research study involving the collection of information from the public to learn about drivers' interactions with certain advanced driver assistance technologies (ADAS).¹ As a part of this research, NHTSA will collect information from the public via screening questions, recording of video and engineering data, and post-drive questionnaires.

NADA supports NHTSA's continued research into the performance and public acceptance of ADAS technologies. Drivers and other road users must understand the capabilities and limitations of ADAS technologies for them to achieve their maximum safety potential. NADA recognizes the importance of driver education, especially at the point of vehicle purchase, to help ensure that these new technologies are well understood.²

To the extent possible, NHTSA should expand its future ADAS research to include drivers outside the designated age range, especially drivers over age 54, given that the average age of a new car customer is 53 years old.³ Various studies indicate that when older drivers fail to understand the ADAS on their vehicles, they are prone to turn those features off.

¹ 84 FR 23154 (May 21, 2020)

² In fact, NADA has produced and distributed to its members *A Dealer Guide to High-Tech Vehicle Safety* which is designed to stress the importance of educating customers on ADAS.

³ Christopher Kurz, Geng Li, and Daniel Vine, *The Young and the Carless? The Demographics of New Vehicle Purchases*, FEDS Notes (June 24, 2016) <https://www.federalreserve.gov/econresdata/notes/feds-notes/2016/the-young-and-the-carless-the-demographics-of-new-vehicle-purchases-20160624.html>

On behalf of NADA, I thank NHTSA for the opportunity to comment on this matter.

Respectfully submitted,

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