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August 25, 2020

Docket Management Facility  
US Department of Transportation  
1200 New Jersey Avenue SE  
West Building, Ground Level  
Room W12-140  
Washington, DC 20590-0001

Attention: Docket No. DOT-NHTSA-2020-0070

Safe Kids Worldwide appreciates the opportunity to comment on the National Highway Traffic Safety Administration (NHTSA) Request for Comment on the “Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative.”

NHTSA’s proposed collection of information for the AV TEST Initiative will provide a mechanism to inform the public and safety advocates of testing activities to be conducted on public roads throughout the country. It will also provide a more complete picture of the regulations and guidelines governing this testing at the state and local levels.

The information collected will be helpful for the public and is consistent with the goals of the Safe Kids Worldwide Children in AVs Consortium. The Consortium was formed to develop guidance to inform legislation, policy, enforcement, education and best practices in this rapidly evolving field to make sure the safety of child passengers is seriously considered and valued in the development of AVs.

One Consortium member, Denise Donaldson, added the following insightful comments:

- Data submitted by developers should include reports of testing that considers the needs of families transporting multiple children, as well as those of children at different ages and developmental stages. Special needs children should also be considered.
- The Consortium is eager to hear about regulatory efforts from state and local authorities that address the safety of children in AVs. Requesting the inclusion of this information about children may serve to remind legislators and regulatory bodies that the topic of child passenger safety in AVs must be addressed.
- While NHTSA may not want to make data collection a mandatory requirement for private companies, it seems as though collection of regulatory information could certainly be required of state and local agencies. CPS laws that address supervision and responsibility for children in AVs will be necessary in coming years. Data to inform the formulation of such rules will benefit the public as well as AV developers and the regulators themselves.



[safekids.org](http://safekids.org)

Ms. Donaldson is editor/publisher of Safe Ride News Publications, educational materials for the professionals in the child passenger safety field. Thank you again for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Torine Creppy". The signature is written in a cursive style and is set against a light gray rectangular background.

Torine Creppy  
President  
Safe Kids Worldwide

