

Comment from David DeVeau

Document Number:

2020-19334

Agency/Docket Number:

NHTSA-2020-0086

Title:

Federal Motor Vehicle Safety Standards; Minimum Sound Requirements for Hybrid and Electric Vehicles

Summary:

The petitioner states that the hardships caused by plant closures have hindered manufacturers' ability to produce FMVSS 141 compliant vehicles. The petitioner also maintains that the closure of test labs in some jurisdictions has complicated the ability of some manufacturers to complete certification tests needed to fully support self-certification of compliance.

(a) Defer the current phase-in period (September 1, 2019 through August 31, 2020) to September 1, 2020 through August 31, 2021

(b) Defer the beginning of full compliance to September 1, 2021

>(a)(b)Requested 12mth; NHTSA requests comments for only 6mths<

(c) Simplify the performance requirements during the phase-in period.

>(c)Not Granted In Intro and In Agency Response below<

After considering the information provided in the petition and assessing the ongoing hardships stemming from the public health emergency, the Agency has decided to grant, in part, the petitioner's requests to delay the phase-in and full compliance dates. The Agency is not adopting the petitioner's request for an alternative phase-in performance standard in this interim final rule.

Comments:

The petitioner speaks of "self-certification". The NHTSA speaks to all "safety-certification of compliance". Conditions of testing are defined within and/or by reference.

One year as requested or 6 months. Ask for twice what you need and settle for half.

Design Standards by the NHTSA are for different sounds for different weight class vehicles. Makers want options and drivers want custom sounds.

The pedestrians this is intended for need specific sounds for clear interpretation of low speed vehicle type and rate of travel.

I would also add a further definition that the sound be regulated by weight, lower to higher frequency equals bigger to smaller vehicles and the faster the vehicle is traveling the faster the beat, faster speeds equal faster pulses.