



January 27, 2021

U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor
Room W12-140
Washington, DC 20590-0001

**Re: Docket No. NHTSA 2016-0031
New Make Inoperative Exemption in Subpart C for Portions of FMVSS No. 111, "Rear Visibility"**

The National Mobility Equipment Dealers Association ("NMEDA") is a nonprofit trade association dedicated to expanding opportunities for people with disabilities to safely drive or be transported in motor vehicles. NMEDA has historically worked closely with NHTSA to address a variety of complex automotive mobility matters, including but not limited to 49 CFR Part 595 Subpart C ("Make Inoperative Exemptions, Vehicle Modifications to Accommodate People with Disabilities").

NMEDA supports NHTSA's proposal to amend 49 CFR Part 595 Subpart C to add a "make inoperative" exemption to allow for the temporary installation of a personal mobility device (PMD) transport device that could obstruct the vehicle's backup camera system. PMD transport devices are an exceptionally common automotive mobility solution, and NMEDA concurs with NHTSA's stated belief that such an exemption can provide appropriate regulatory certainty to allow for installation of PMD transport devices.

If NHTSA has questions regarding this comment or would like to discuss any element of this comment in greater detail, please contact NMEDA's Director of Government Relations (Amy.Schoppman@nmeda.org).

Respectfully Submitted,

Danny Langfield
Chief Executive Officer