



January 8, 2021

Docket Management Facility M-30
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590

RE: Docket No. NHTSA-2020-0102

Dear Docket Officer:

Thank you for allowing the National Safety Council (NSC) to provide comments to the U.S. Department of Transportation (DOT) National Highway Traffic Safety Administration (NHTSA) Request for Information (RFI) on available or late-stage technology under development for impaired driving detection and mitigation.

NSC is America's leading nonprofit safety advocate and has been for over 100 years. As a mission-based organization, we work to eliminate the leading causes of preventable death and injury, focusing our efforts on the workplace, roadway, and impairment. We create a culture of safety to keep people safer at work and beyond so they can live their fullest lives. Our more than 15,500 member companies represent 7 million employees at nearly 50,000 U.S. worksites.

NSC knows that vehicle technology is improving safety and we are very hopeful that in-vehicle passive alcohol detection technology can prevent alcohol-impaired crashes before they happen. We lost 10,511 lives to alcohol-impaired driving in 2018,¹ a leading killer on our roadways, and all these crashes are preventable. In the 116th Congress, NSC supported several legislative efforts to require such technology in motor vehicles – the *RIDE Act* (S.2604), the *HALT Drunk Driving Act* (H.R.4354), and provisions in the *Moving America Forward Act* (H.R.2) – because data show that vehicle safety requirements save lives.

NHTSA should not wait for directives from Congress to promulgate an FMVSS for passive alcohol-detection technology. Rather, NSC believes that NHTSA should be proactive in requiring this technology. NSC also encourages vehicle manufacturers to proactively incorporate this type of technology in vehicles. NSC is aware that several technology developers have created solutions to solve this persistent problem and we

¹<https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812864#:~:text=In%202018%20there%20were%2010%2C511%20people%20killed%20in%20alcohol%2Dimpaired,the%20United%20States%20in%202018.>



are hopeful that there will be a variety of viable, in-vehicle passive alcohol detection technology options and driver monitoring systems for the marketplace. A 2020 study from the Insurance Institute for Highway Safety² showed that in-vehicle alcohol-detection systems could prevent more than a quarter of U.S. road fatalities and save more than 9,000 lives a year.

NSC is pleased that NHTSA is working to implement and integrate impaired driving technology across the automotive industry. NSC looks forward to working with you to eliminate preventable deaths on our roadways.

Sincerely,

A handwritten signature in black ink that reads "Lorraine Martin". The signature is written in a cursive, flowing style.

Lorraine M. Martin
President and CEO

² <https://www.iihs.org/news/detail/alcohol-detection-systems-could-prevent-more-than-a-fourth-of-u-s-road-fatalities#:~:text=Technology%20could%20offer%20the%20next%20big%20breakthrough.&text=Alcohol%2Ddetection%20systems%20that%20stop,Institute%20for%20Highway%20Safety%20shows>.