

**FEDERAL REGISTER Document Number:** 2020-25930

**Summary:** NHTSA is requesting comment on the development of a framework for Automated Driving System (ADS) safety. The framework would objectively define, assess, and manage the safety of ADS performance while ensuring the needed flexibility to enable further innovation. The Agency is seeking to draw upon existing Federal and non-Federal foundational efforts and tools in structuring the framework as ADS continue to develop. NHTSA seeks specific feedback on key components that can meet the need for motor vehicle safety while enabling innovative designs, in a manner consistent with agency authorities.

**Agency:** National Highway Traffic Safety Administration

**Parent Agency:** Department Of Transportation

**Date Published:** December 03, 2020

**Docket Number:** NHTSA-2020-0106

**Action:**

Advance notice of proposed rulemaking (ANPRM):  
Request for Comments

**Action Reply:**

Comments

**Date Submitted:** January 15, 2021

**Comments Submitted By:**

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**Attachments:** (File Name)

DOT-NHTSA-NCAP-ADS-Safety-Framework\_David-DeVeau.pdf

Title-49-USC-32302-Vehicle-Information\_David-DeVeau.pdf

Title-49-USC-30114-30115-Special-Exemptions\_David-DeVeau.pdf

Federal-State-Vehicle-Safety-Inspections\_David-DeVeau.pdf

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## Introduction

This submittal is in favor of utilizing updates to the NHTSA NCAP Crash / Collision Safety Ratings System in which the Primary Purpose is to Add Collision Avoidance Next To Crash Protection and To Define All Safety Features on the Safety Rating Sticker that is mandatory on all New Vehicles sold in The United States of America.

To continue verification of the manufacturer's certification requirements per the Safety Act at point of delivery to the distributor or dealer and to assist FMVSS to develop test procedures and the NHTSA to establish performance measurements of existing and new safety innovations.

The main objective is to advance safety in a clear manner that will remain consistent throughout all the levels of development from prototype testing to approval for production with a basic oversight ability without inhibiting the advancement of all types of increased safety innovations.

The clearest approach is already defined in 49 USC §32302: Passenger Motor Vehicle Information; damage susceptibility, crashworthiness and crash avoidance are based on performance of conditions at rates of speed.

The following will demonstrate how the NHTSA / NCAP Ratings System can be effectively utilized to enable safely advancing today's Driver Assist Technology and inspire a firm leadership into the unlimited future of Automated Driving Systems.

## Crash Protection Measurement

**PASS:** External Bruising and Abrasions

**PASS:** Internal Joint Sprains

**PASS:** Internal Organ Bruising

**FAIL:** External or Internal Damage

ALL MAIN SEAT LOCATIONS: (Nearest to Doors or Windows)

Humanoid Crash Dummy

225 Pound Male Adult

180 Pound Female Adult

80 Pound Adolescent Child

ANY SECONDARY SEAT LOCATION: (In the Middle or Center)

Humanoid Crash Dummy In Additional Safety Seat

Up to 80 Pound Child

CONDITIONS:

- Vehicle Areas Defined Collide At Speed Specified
- Occupant Compartment Is Measured For Intrusion Of Occupational Areas
- All Occupants Are Measured and Visually Inspected For Crash Results
- Laboratory Conditions Simulate Actual Crash Conditions Within 80%

## **Collision Avoidance Measurement**

WARNING Systems:

Audio and or Visual and or Tactile Vibration Alerts

ASSIST Systems:

Tactile Resistance and or Initial Intervention

AUTOMATIC Systems:

Complete Intervention and or Activation

AUTONOMOUS Systems:

Automated Directional and or Speed Control

CONDITIONS:

- Warnings and Assist Systems Are Measured On Ability Within A Minimum Measurement of Distance
- Automatic and Autonomous Systems Are Measured On Ability To Anticipate and or Calculate Course and Perform Actions
- All Systems Are Measured On Ability To Perform Specific Tasks On Specified Road Types Within A Range of Environmental Conditions Up To Speed Specified
- Laboratory Conditions Simulate Actual Collision Conditions Within 80%

## **Testing Measurement Levels**

### **Crash Protection Levels:**

#### **L0: Occupant Safety Systems**

Structural Absorption and or Diversion for Compartment Integrity

Personal Restraints and or Movement Absorption for All Seat Locations

#### **L0-P: Pedestrian Safety Systems**

Structural Absorption and or Diversion

Pedestrian and or Pedestrian Operated Vehicles

### **Collision Avoidance Levels:**

#### **L1: Warning Systems**

Audio and or Visual Alerts and or Tactile Vibrations

Automated and or Selected Safety Features

#### **L1-P: Pedestrian Warning Systems**

External Audio and or Visual Alerts

Pedestrian and or Pedestrian Operated Vehicles

#### **L2: Assist Systems**

Tactile Resistance and or Initial Intervention

Directional and or Speed Counter Measures

#### **L3: Automatic Systems**

Complete Intervention and or Activation

Directional and or Speed Control

#### **L4: Autonomous Systems**

Directional and or Speed Control

No Human Driver Interface and or Intervention

# Sticker

EXAMPLE: BASIC MODEL

2020 <b>DEVCO</b> Commuter Coupe		2 Seat Sport		
Crash / Collision - Safety Ratings - (Standard or Regulated / Optional / Other Colors)				
Protection		Avoidance		Safety Features
105mph ★				<b>Drive Paddle Shift</b>
95mph ★	Front Center-3/4			<b>Separable Safety Cage</b>
85mph ★		Front Collision Warning	Side Lane Departure Warning	<b>High-Speed Warnings</b>
75mph ★	Front 1/2-1/4	Rear Center-3/4		
65mph ★	Side Center-3/4	Rear 1/2-1/4		
55mph ★				<b>Automatic Hi/Low Beam</b>
45mph ★		Front / Side Traction Automatic		
35mph ★		Front Brake Stop Automatic		
25mph ★	Front Pedestrian		Front Pedestrian Warning	<b>Front Seatbelt Airbag</b>
15mph ★	Rear Pedestrian	Rear Brake Stop Automatic	Rear Pedestrian Warning	<b>Parking Assist</b>

National Highway Traffic Safety Administration (NHTSA)  
 Crash / Collision Tests Are Under Laboratory Conditions At Speed Indicated +/- 4mph  
 Crash Protection For Passengers In All Seat Locations At 100% Survival  
 Collision Avoidance Technology Has 100% Proof Of Function  
 Actual Crash / Collision Conditions Are Simulated Within 80%  
 For Additional Information Go To [www.SaferCar.gov](http://www.SaferCar.gov)

**SILVER** 55+ Years  
**BLUE** Family Needs  
**GOLD** Performance

## Regulatory Oversight Authority & Conditions

National Highway Traffic Safety Administration (NHTSA)  
 Crash / Collision Tests Are Under Laboratory Conditions At Speed Indicated +/-4mph  
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 Collision Avoidance Technology Has 100% Proof Of Function  
 Actual Crash / Collision Conditions Are Simulated Within 80%

Sticker Must Be Displayed On New Vehicles Sold In The U.S. Per 49 USC §32302

# Sticker

EXAMPLE: BASIC MODEL OPTIONS

2020 <b>DEVCO</b> Commuter Coupe		2 Seat Sport		
Crash / Collision - Safety Ratings - (Standard or Regulated / Optional / Other Colors)				
Protection		Avoidance		Safety Features
105mph ★				<b>Drive Paddle Shift</b>
95mph ★	Front Center-3/4			<b>Separable Safety Cage</b>
85mph ★		Front Collision Warning	Side Lane Departure Warning	<b>High-Speed Warnings</b>
75mph ★	Front 1/2-1/4	Rear Center-3/4	Front Brake Stop Assist	<b>Highway Assist</b>
65mph ★	Side Center-3/4	Rear 1/2-1/4	Front Driver Speed Assist	<b>Automatic Hi/Low Beam</b>
55mph ★				
45mph ★		Front / Side Traction Automatic		
35mph ★		Front Brake Stop Automatic	Front Traffic Automatic	<b>Low-Speed Highway</b>
25mph ★	Front Pedestrian		Front Pedestrian Warning	<b>Front Seatbelt Airbag</b>
15mph ★	Rear Pedestrian	Rear Brake Stop Automatic	Rear Pedestrian Warning	<b>Parking Assist</b>

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## Crash Protection / Collision Avoidance / Model Safety Features

Expansive Main Categories with Clear and Targeted Safety Features



# Sticker

EXAMPLE: BASIC MODEL OPTIONS ALTERNATE

2020 <b>DEVCO</b> Commuter Coupe		2 Seat Sport		
Crash / Collision - Safety Ratings - (Standard or Regulated / Optional / Other Colors)				
Protection		Avoidance		Safety Features
105mph ★				<b>Drive Paddle Shift</b>
95mph ★	Front Center-3/4			<b>Separable Safety Cage</b>
85mph ★		Front Collision Warning	Side Lane Departure Warning	<b>High-Speed Warnings</b>
75mph ★	Front 1/2-1/4	Rear Center-3/4	Front Brake Stop Assist	Front Lane Keep Assist
65mph ★	Side Center-3/4	Rear 1/2-1/4	Front Driver Speed Assist	Side Lane Departure Assist
55mph ★				<b>Travel Congested Highways ?</b>
45mph ★		Front / Side Traction Automatic		<b>Automatic Hi/Low Beam</b>
35mph ★		Front Brake Stop Automatic	Front Traffic Automatic	<b>Highway Commute Stop &amp; Go ?</b>
25mph ★	Front Pedestrian		Front Pedestrian Warning	<b>Front Seatbelt Airbag</b>
15mph ★	Rear Pedestrian	Rear Brake Stop Automatic	Rear Pedestrian Warning	<b>Parking Assist</b>

National Highway Traffic Safety Administration (NHTSA)  
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**SILVER** 55+ Years  
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## Crash Protection / Collision Avoidance / Model Safety Features

Flexible Ability to Clearly Optimize Target Demographics

# Sticker

EXAMPLE: LUXURY MODEL

2020 <b>DEVCO</b> Commuter Coupe		2 Seat Luxury		
Crash / Collision - Safety Ratings - (Standard or Regulated / Optional / Other Colors)				
Protection		Avoidance		Safety Features
105mph ★				<b>Drive Paddle Shift</b>
95mph ★	Front Center-3/4			<b>Separable Safety Cage</b>
85mph ★		Front Collision Warning	Side Lane Departure Warning	<b>High-Speed Warnings</b>
75mph ★	Front 1/2-1/4	Rear Center-3/4	Front Brake Stop Assist	
65mph ★	Side Center-3/4	Rear 1/2-1/4	Front Speed Assist	<b>Highway Assist</b>
55mph ★			Side Lane Departure Assist	<b>Automatic Hi/Low Beam</b>
45mph ★		Front / Side Traction Automatic		
35mph ★		Front Brake Stop Automatic	Front Traffic Automatic	<b>Low-Speed Highway</b>
25mph ★	Front Pedestrian		Front Pedestrian Warning	<b>Front Seatbelt Airbag</b>
15mph ★	Rear Pedestrian	Rear Brake Stop Automatic	Rear Pedestrian Warning	<b>Automatic Parking</b>

National Highway Traffic Safety Administration (NHTSA)  
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 Collision Avoidance Technology Has 100% Proof Of Function  
 Actual Crash / Collision Conditions Are Simulated Within 80%  
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**SILVER** 55+ Years  
**BLUE** Family Needs  
**GOLD** Performance

Clearly Defined Ability At Speed Specified

Competitive Inspiration To Go Faster Safer

## Production Vehicle Testing Request Levels

### YEAR – MAKE – MODEL

DOT Testing Level	DOT Testing Speed	Testing Conditions Vehicle Direction of Travel Area Location of Vehicle Impact
L0	91 to 99 mph	Front; Center to 3/4
L0	71 to 79 mph	Front; 1/2 to 1/4 / Rear; Center to 3/4
L0	61 to 69 mph	Side; Center to 3/4 / Rear; 1/2 to 1/4
L0p	21 to 29 mph	Front; Center to 3/4
L0p	11 to 19 mph	Rear; Center to 3/4
L1	41 to 89 mph	Front; Collision Warning / Side; Lane Departure Warning
L1p	1 to 29 mph	Front; Pedestrian Warning
L1p	1 to 19 mph	Rear; Pedestrian Warning
L2	41 to 79 mph	Front; Brake Stop Assist / Lane Keep Assist
L2	41 to 69 mph	Front; Speed Assist / Side; Lane Departure Assist
L3	1 to 49 mph	Front / Side; Traction Automatic
L3	1 to 39 mph	Front; Brake Stop Automatic
L3	1 to 19 mph	Rear; Brake Stop Automatic
L4	1 to 39 mph	Front; Traffic Automatic / Speed Control / Lane Keep Control
L4	1 to 19 mph	Side; Traffic Automatic / Lane Change Management
L4	1 to 19 mph	All; Parking Automatic

# Production Vehicle Testing Request Conditions

## YEAR – MAKE – MODEL

### Forward / Rearward Brake:

Warning: Audio & Visual & Tactile Alerts; Always Active

Assist: Initial Measure; Selective

Proximity; Front 35 Feet / Rear 15 Feet

Automatic: Applicable with ADS Traffic Automatic

### Speed Control:

Warning: Audio & Visual & Tactile Alerts; When Active

Assist: Initial Counter Measure; Selective

Speed Limit Range and or Excessive Speed Control; Selective

Proximity; Front 35 Feet / Rear 15 Feet / Side 5 Feet

Automatic: Applicable with ADS Traffic Automatic

### Lane Keep / Lane Departure:

Warning: Audio & Visual & Tactile Alerts; Always Active

Assist: Initial Counter Measure; Selective and/or Activated with Lane Change Signal

Proximity; Front 25 Feet / Rear 15 Feet / Side 5 Feet

Automatic: Applicable with ADS Traffic Automatic

### Traffic Automatic:

Warning: Audio & Visual & Tactile Alerts; When Active

Assist: Initial Counter Measure; Selective

Proximity; Front 25 Feet / Rear 15 Feet / Side 5 Feet

ADS: Autonomous; Speed Control / Lane Keep Control; Selective

Lane Departure / Lane Change Steering Control; Selective with Lane Change Signal

Limited Access Roadways; Moderate Weather; Day/Night

### Parking Automatic:

Warning: Audio & Visual & Tactile Alerts; When Active

Assist: Initial Counter Measure; Selective

Proximity; Front / Rear / Side, 15 Feet

ADS: Autonomous; Speed Control / Lane Change Control /

Limited Stagnant Space Management; Selective

All Access Roadways and Parking Lots; Parallel / Perpendicular

Moderate Weather; Day/Night / Extreme Weather; Day/Night/Extra Lighting



# Sticker

EXAMPLE: LUXURY MODEL PROTOTYPE

## Production Approved Vehicle

<b>2020 DEVCO Commuter Coupe</b>		<b>2 Seat Luxury</b>	
<b>Crash / Collision - Safety Ratings -</b> (Standard or Regulated / Optional / Other Colors)			
<b>Protection</b>		<b>Avoidance</b>	
105mph ★			<b>Drive Paddle Shift</b>
95mph ★	Front Center-3/4		<b>Separable Safety Cage</b>
85mph ★		Front Collision Warning	Side Lane Departure Warning
75mph ★	Front 1/2-1/4	Rear Center-3/4	Front Lane Keep Assist
65mph ★	Side Center-3/4	Rear 1/2-1/4	Front Brake Stop Assist
55mph ★		Front Speed Assist	Side Lane Departure Assist
45mph ★		Front / Side Traction Automatic	<b>Automatic Highway</b>
35mph ★		Front Brake Stop Automatic	<b>Highway Assist</b>
25mph ★	Front Pedestrian		Front Traffic Automatic
15mph ★	Rear Pedestrian		Front Pedestrian Warning
		Rear Brake Stop Automatic	Rear Pedestrian Warning

**National Highway Traffic Safety Administration (NHTSA)**  
 Crash / Collision Tests Are Under Laboratory Conditions At Speed Indicated +/- 4mph  
 Crash Protection For Passengers In All Seat Locations At 100% Survival  
 Collision Avoidance Technology Has 100% Proof Of Function  
 Actual Crash / Collision Conditions Are Simulated Within 80%  
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**SILVER 55+ Years**  
**BLUE Family Needs**  
**GOLD Performance**

## Prototype Technology

### Clearly Defined Prototype Technology

Sticker Must Be Displayed On All Public Road Test Vehicles Per 49 USC §30114-30115

## Production Vehicle Prototype Testing Request Levels

### YEAR – MAKE – MODEL

DOT Testing Level	DOT Testing Speed	Testing Conditions Vehicle Direction of Travel Area Location of Vehicle Impact
L4	51 to 79 mph	Front / Side; Automatic Highway
L4	1 to 49mph	All; Automatic City

## Production Vehicle Prototype Testing Request Conditions

### YEAR – MAKE – MODEL

#### Automatic Highway:

Warning: Audio & Visual & Tactile Alerts; When Active

ADS: Autonomous; Speed Control / Lane Keep Control; Selective Autonomous; Lane Departure / Lane Change Steering Control; Selective Proximity Front; 100 Feet / Rear; 35 Feet / Side; 15 Feet Limited Access Roadways; Moderate Weather; Day/Night

#### Automatic City:

Warning: Audio & Visual & Tactile Alerts; When Active

ADS: Autonomous; Speed Control / Lane Keep Control / Lane Departure Control / Signal Recognition / Signage Recognition / Cross Traffic Management / Pedestrian Management / Pedestrian Operated Vehicle Management; Selective Proximity; Front / Side 75 Feet / Rear 25 Feet All Access Roadways; Moderate Weather; Day/Night

# Sticker

EXAMPLE: LUXURY MODEL PROTOTYPE STATE CERTIFIED

## Production Approved Vehicle

<b>2020 DEVCO Commuter Coupe</b>		<b>2 Seat Luxury</b>	
<b>Crash / Collision - Safety Ratings -</b> (Standard or Regulated / Optional / Other Colors)			
<b>Protection</b>		<b>Avoidance</b>	
105mph ★			<b>Drive Paddle Shift</b>
95mph ★	Front Center-3/4		<b>Separable Safety Cage</b>
85mph ★		Front Collision Warning	Side Lane Departure Warning
75mph ★	Front 1/2-1/4	Rear Center-3/4	Front Lane Keep Assist
65mph ★	Side Center-3/4	Rear 1/2-1/4	Front Speed Assist
55mph ★			Side Lane Departure Assist
45mph ★		Front / Side Traction Automatic	<b>Automatic Highway</b>
35mph ★		Front Brake Stop Automatic	<b>Highway Assist</b>
25mph ★	Front Pedestrian		Front Traffic Automatic
15mph ★	Rear Pedestrian		Front Pedestrian Warning
		Rear Brake Stop Automatic	Rear Pedestrian Warning

National Highway Traffic Safety Administration (NHTSA)  
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**SILVER** 55+ Years

**BLUE** Family Needs

**GOLD** Performance

## Prototype Technology

- TEST VEHICLE -

# 0162-MA

## **State Certified Prototype Testing Conditions**

### **YEAR – MAKE – MODEL**

Automatic Highway:

ADS: Limited Access Roadways, Limited Locations, Limited Times  
Controlled Number of Licensed Vehicles  
Prototype Technology State Certified Safety Test Driver(s)

Automatic City:

ADS: Full Access Roadways, Limited Locations, Limited Times  
Controlled Number of Licensed Vehicles  
Prototype Technology State Certified Safety Test Driver(s)

Go To NHTSA AV Test Tracking Tool Web Site  
To Look Up Your State, City or Town for Additional Testing Information  
<https://www.nhtsa.gov/automated-vehicles-safety/av-test-initiative-tracking-tool>

Note:

State Test Vehicle Number Enables Clear Tracking & Reporting



## Sticker

EXAMPLE: PROTOTYPE PASSENGER TRANSPORT VEHICLE

# Production Approved Vehicle

2020 <b>DEVCO</b> Commuter Shuttle		8 Seat Luxury		
Crash / Collision - Safety Ratings - (Standard or Regulated / Optional / Other Colors)				
	Protection	Avoidance		Safety Features
105mph ★				
95mph ★				
85mph ★				
75mph ★				
65mph ★	Front Center-3/4			<b>Separable Safety Cage</b>
55mph ★				<b>Remote Safety Driver</b>
45mph ★	Front 1/2-1/4	Rear Center-3/4	Front Pedestrian Automatic	<b>Automatic City</b>
35mph ★	Side Center-3/4	Rear 1/2-1/4		<b>All Full Seat Airbags</b>
25mph ★	Front Pedestrian			<b>4-1/2 Hour Run Time</b>
15mph ★	Rear Pedestrian		Rear Pedestrian Automatic	

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# Prototype Technology

### Clearly Defined Prototype Technology

Sticker Must Be Displayed On All Public Road Test Vehicles Per 49 USC §30114-30115

## Testing Request Prototype Levels

### YEAR – MAKE – MODEL

DOT Testing Level	DOT Testing Speed	Testing Conditions Vehicle Direction of Travel Area Location of Vehicle Impact
L4	1 to 49mph	All; Automatic City

## Testing Request Prototype Conditions

### YEAR – MAKE – MODEL

Automatic City:

Warning: Audio & Visual External & Remote

Assist: Remote Safety Driver Overriding Control

ADS: Autonomous; Speed Control / Lane Keep Control / Lane Departure Control /  
Signal Recognition / Signage Recognition / Cross Traffic Management /  
Pedestrian Management / Pedestrian Operated Vehicle Management  
Proximity; Front / Side 75 Feet / Rear 25 Feet  
All Access Roadways; Moderate Weather; Day/Night

# Sticker

EXAMPLE: PROTOTYPE PACKAGE TRANSPORT DELIVERY VEHICLE

## Production Approved Vehicle

<b>2020 DEVCO Package Transport</b>		<b>Local Delivery</b>	
<b>Crash / Collision - Safety Ratings -</b> (Standard or Regulated / Optional / Other Colors)			
	<b>Protection</b>	<b>Avoidance</b>	<b>Safety Features</b>
105mph ★			
95mph ★			
85mph ★			
75mph ★			
65mph ★			
55mph ★			
45mph ★			<b>Crash Absorption</b>
35mph ★			<b>Remote Safety Driver</b>
25mph ★	Front Pedestrian	Front Pedestrian Automatic	ALL Traffic Automatic
15mph ★	Rear Pedestrian	Rear Pedestrian Automatic	<b>Automatic City</b>
<small>National Highway Traffic Safety Administration (NHTSA)          Crash / Collision Tests Are Under Laboratory Conditions At Speed Indicated +/- 4mph          Crash Protection For Passengers In All Seat Locations At 100% Survival          Collision Avoidance Technology Has 100% Proof Of Function          Actual Crash / Collision Conditions Are Simulated Within 80%          For Additional Information Go To <a href="http://www.SaferCar.gov">www.SaferCar.gov</a></small>			<b>SILVER 55+ Years</b> <b>BLUE Family Needs</b> <b>GOLD Performance</b>

## Prototype Technology

### Clearly Defined Prototype Technology

Sticker Must Be Displayed On All Public Road Test Vehicles Per 49 USC §30114-30115

## Testing Request Prototype Levels

### YEAR – MAKE – MODEL

DOT Testing Level	DOT Testing Speed	Testing Conditions Vehicle Direction of Travel Area Location of Vehicle Impact
L4	1 to 29mph	All; Automatic City

## Testing Request Prototype Conditions

### YEAR – MAKE – MODEL

Automatic City:

Warning: Audio & Visual External & Remote

Assist: Remote Safety Driver Overriding Control

ADS: Autonomous; Speed Control / Lane Keep Control / Lane Departure Control /  
Signal Recognition / Signage Recognition / Cross Traffic Management /  
Pedestrian Management / Pedestrian Operated Vehicle Management  
Proximity; Front / Side 75 Feet / Rear 25 Feet  
All Access Roadways; Moderate Weather; Day/Night

## Conclusion

This NHTSA NCAP 10 Star Speed Safety Rating System addresses the following:

### A. Questions About a Safety Framework

1. Simplifies Engineering Measures
2. Simplifies Agency Oversight
3. Simplifies Manufacturers Assessment of Core Safety
4. Assists NHTSA Engagement without hampering innovation
5. Assures Agency Assessment of Manufacturers Safety Priority
6. Ensures Core Elements within definition of Crash Protection and Collision Avoidance by separation of types of technologies
7. Uses DOT / NHTSA Measurement Levels and Conditions for Testing
8. Effectively moves paths from Prototype Testing to Safety Standards
9. Ensures consistent NHTSA validation of Safety Standards within Legal Obligations
10. Assures Consumer Confidence of NHTSA Assessments of Safety
11. Ensures Continued Performance Evaluations and Agency Control by;  
[Federal-State-Vehicle-Safety-Inspections\\_David-DeVeau.pdf](#)
12. Enables Reliable Demonstrations of Safety Performance Levels and
13. Persuasive Demonstrations of Core Safety Function Performance

### B. Question About NHTSA Research

14. Generates Increased Budgets necessary to conduct continued research and oversight by charging fees for NHTSA Certification of Independent Testing Facilities and by implementing a Fee Based Testing Structure for Manufacturers to Validate Safety Performance that is compliant with existing FMVSS and/or is as defined in the DOT / NHTSA Level Testing Requests

### C. Questions About Administrative Mechanisms

- 15-19. Answers administrative mechanisms in this document
20. Enables positive cooperation with FMVSS compliance pathways
21. See B.14 for both NHTSA and FMVSS Regulatory Oversight

### D. Question About Statutory Authority

- 22-25. Answers all regulatory compliance questions of Rulemaking, Enforcement, Guidance, and Authority under the Vehicle Safety Act