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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-2020-0106

Safe Kids Worldwide appreciates the opportunity to comment on the National Highway Traffic Safety Administration (NHTSA) advance notice of proposed rulemaking (ANPRM) regarding a Framework for Automated Driving System Safety (Docket No. NHTSA-2020-0106). Believing aspects of an Automated Driving System can make all who share the roads safer, Safe Kids supports the development of automated driving systems. We are an organization whose mission is to prevent childhood injuries; thus, we have a compelling interest in ensuring that the safety and needs of child occupants in automated driving systems is a priority during all phases of development. It cannot be an afterthought and we are concerned the notice does not discuss child safety.

Safe Kids has championed this issue and in 2018 hosted a Blue-Ribbon Panel to ensure the needs of children are met throughout the development of AVs. The [Children in Autonomous Vehicles \(AVs\) Blue-Ribbon Panel Report](#) outlines a set of eight recommendations and calls to action across policy, advocacy, enforcement, communications and research arenas. Safe Kids acted on one of the recommendations from the Blue-Ribbon Panel and convened a consortium of child safety advocates and transportation experts for an 18-month effort to focus on the safety needs of children in this evolving transportation field. The consortium concludes in March 2021 and afterwards we will publicly launch a toolkit with resources to inform legislation, policy, enforcement, education, and best practices to make sure the safety of child passengers is considered and valued in the development of AVs. We are optimistic that this process and new resources can help NHTSA in its study of the development and roll out of ADS and AVs.

As NHTSA considers its Framework for ADS Safety, it should play a key role in ensuring that the safety of children and other vulnerable road users is a priority as they will indeed have to interact with ADS-equipped vehicles on the roads in the future. For example, in the section on Core ADS Safety Functions, the “perception” function references detection and identification of “dynamic objects (e.g., vehicles,



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cyclists, and pedestrians)’ by sensors within proximity of the vehicle, this would be an opportunity to clearly specify children given the difference in size, stature and the unique ways they move. We recommend that the safety of individuals, especially children, outside of the vehicle, whether walking or biking, is given as much priority as those in the vehicle.

We commend NHTSA on the development of this framework as it is an opportunity to be inclusive from the onset when it comes to the safety of children and other vulnerable road users. We note, however, that the comment period for this part of the process will conclude just ten days after a new Administration took office. It may be useful to extend the comment period so the new Administration can study this important aspect of the process. We also appreciate NHTSA’s commitment to moving the process forward and that this will surely not be the last word. Thank you again for this opportunity to comment.

Sincerely,



Torine Creppy  
President  
Safe Kids Worldwide

