



January 14, 2021

James C. Owens, Esq.
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

RE: Advanced Notice of Proposed Rulemaking; Federal Motor Vehicle Safety Standards; Test Procedures, NHTSA Docket No. 2020-0109, 85 Fed. Reg. 79456 (December 10, 2020)

Dear Acting Administrator Owens:

The Alliance for Automotive Innovation (Auto Innovators) requests a 30 day extension of the public comment period for the Federal Motor Vehicle Safety Standards: Test Procedures, Advance Notice of Proposed Rulemaking (ANPRM).

This additional time is necessary to permit Auto Innovators to conduct a comprehensive review of the extensive number of regulations and Federal Motor Vehicle Safety Standards (FMVSSs) that contain detailed test procedures. In addition, many of these regulations and FMVSSs have requirements and test procedures that reference industry standards (e.g., SAE, ISO, ANSI) many of which are out of date and some of which are even cancelled. While NHTSA's ANPRM request is straightforward, conducting the in-depth review and analysis necessary to develop informed comments identifying candidate test procedures and developing constructive recommendations is not.

A compounding complication is the fact that since the subject notice was issued, efforts to organize work group meetings have been hampered by both end of year holiday leave and additional working inefficiencies induced by the extensive COVID meeting restrictions.

As a result, we request a 30 day extension in order to provide comprehensive, constructive comments, while minimizing delays to this important rulemaking.

Auto Innovators appreciates the opportunity to provide input to NHTSA on this important rulemaking. We look forward to any follow up with the agency to discuss this request further.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Schmidt", is written over a horizontal line.

Scott Schmidt
Vice President, Safety Policy