



**MOTOR VEHICLE**  
National Peer Learning Team

**Docket No. NHTSA-2020--0106**

Ms. Ann Carlson  
Acting Deputy Administrator  
National Highway and Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**RE: ANPRM - Part 571 – Request for Comments on NHTSA’s Framework for Automated Driving System Safety**

The Motor Vehicle National Peer Learning Core Team (MV-NPLT) is pleased to submit these comments to the Department of Transportation’s National Highway Traffic Safety Administration’s (NHTSA) Advanced Notice of Proposed Rulemaking (ANPRM) requesting public comments regarding the potential development of a set of safety framework principles to govern the safe behavior of automated driving systems (ADS) in the future.

The MV-NPLT is a broad network of injury prevention professionals, researchers, engineers, traffic safety experts, and policy makers, with funding from the CDC-funded Regional Network Coordinating Organization (RNCO; Regions 1 and 2<sup>1</sup>). Over the past 5 years, MV-NPLT Core Team members have worked to promote a public health approach to the acceptance and integration of automated safety features that can rapidly reduce automobile crash injuries and fatalities and decrease crash disparities.

Based on our work, we would like to contribute the following comments and key lessons.

The MV-NPLT appreciates the opportunity from NHTSA to provide feedback and recommendations to the potential development of safety framework principles that will guide ADS safety. We are supportive of NHTSA’s efforts to develop a framework for ADS safety principles and generally agree with the approach indicated through the questions provided in the ANPRM. We have learned from our discussions with diverse audiences of motor vehicle and public safety professionals, engineers, and the public that widespread questions and concerns with use of ADS remain. NHTSA’s request for public comment provides an opportunity to address the needs of a broader group of public stakeholders, particularly those for whom greater access to ADS could result in rapid reduction of automobile crash injuries and fatalities and decrease crash disparities. We urge NHTSA to consider disparities for persons with disabilities

---

<sup>1</sup> Funding made available through Grant NU17CE924835-05 to the Massachusetts Department of Public Health. The views represented in this report are those of the authors and do not necessarily reflect the views of the Massachusetts Department of Public Health.”

and racial-ethnic populations, as well as based on income or geography. We also applaud NHTSA's public comment request for the *potential* to articulate the beliefs and values that can direct our focus and resources to more equitable access to ADS and motor vehicle safety outcomes.

Regarding the use of regulations to establish common safety standards, the MV-NPLT has seen these same outcomes achieved through collaborations and other means. Networks of manufacturers, policy officials and other stakeholders have voluntarily united to address mobility and equity through engineering design. Broad alliances such as the PAVE Campaign (Partners for Automated Vehicle Education) and organizations like the National Safety Council, have worked to establish consistent language and collaboratively launch consumer information campaigns that communicate the development of ADS to meet common safety goals. Motor vehicle manufacturer voluntary agreements are another successful, and sometimes quicker, means for advancing safety, such as the agreement to equip new vehicles with Automatic Emergency Braking (AEB) as standard equipment and the recent agreement by vehicle manufacturers to equip vehicles with rear seat reminder systems to combat pediatric vehicular heatstroke.

We commend NHTSA for launching the Automated Vehicles Transparency and Engagement for Safe Testing's AV Test Initiative to promote transparency of ADS development and testing. We encourage NHTSA to encourage states and local policy makers to expand their efforts for transparency through outreach and dialog, specifically with racial-ethnic communities. Advanced vehicle technologies present the potential to either narrow or widen existing inequities in transportation safety, depending on how effectively stakeholders anticipate and address potential obstacles to equity of access and education. The health disparities, or preventable differences in the burdens of injury experienced by racial and ethnic communities, come as a result of systemic historical and contemporary policies, practices, and norms. Racial/ethnic, urban, and rural communities often lack the infrastructure or design that supports AV testing or use, and are excluded from public education efforts on ADS. By updating the AV TEST Initiative to include reporting on equity-focused community outreach, we believe engineers, manufacturers, policy officials, NHTSA, and especially the public can more quickly identify challenges to ADS safety.

In addition to increasing the number of communities educated on ADS, NHTSA's encouragement of more expansive outreach through the AV TEST Initiative will promote racial equity through increased access. For ADS to lead to increased safety, every population must encounter minimal or no barriers to access and use of ADS motor vehicles. An expanded understanding of the necessary safety frameworks across diverse settings and contexts can be achieved by considering how to increase access to ADS through fleet ownership or car-share/ride-hailing models, and integrating ADS into the motor fleet across communities where infrastructure and connectivity are lacking or not up to date.

Again, we appreciate the opportunity to comment. Please visit our publication, "[Preparing the Public Health Community for Autonomous Vehicles: A Resource Guide](#)," for additional considerations and review of these ideas.

/S/ Motor Vehicle National Peer Learning Team Core Team