

Comment from Anonymous

As a member of the general public, I want to thank the NHTSA for extending the comment period 60 days in response to the Venable LLP request and for clarifying in the footnotes that the comment function will be left open after April 1 for continued consideration, where practicable. In light of company incentive to secure first mover advantage in ADS, the government should not hesitate to impose a stringent framework to ensure the general safety and wellbeing of the average citizen.

I am a proponent of mandatory safety drivers, trained in their position, as well as mandatory back-up systems, particularly in early development stages. The Federal Register included an example of a brake pedal on page 4 – while the pedal will exist in an ADS capacity, it should also exist in a traditional manual control capacity in case of an emergency. Here, the flight industry offers guidance – controls have been automated to a large degree, but pilots still find themselves switching to manual controls to counteract glitches in the system. Even as technology progresses, as a potential user of ADS, I hope for some basic requirement to override automated controls (return to traditional manual controls), particularly for residents living in remote areas or areas with challenging terrain.

Beyond overriding a system, there should also be a measure for support and emergency services (connectivity). The Federal Register entry specifically mentions increasing accessibility for people with disabilities and people incapable of driving. Although this may be more of an addendum for specialized services, if NHTSA is explicitly citing these benefits in the Federal Register, a standard for minimum support / emergency systems should be defined. If a vehicle were to malfunction, there should be some level of protection for vulnerable populations.

I would also like to express my concern that the NHTSA framework predominantly focuses on the initial launch of ADS, measures of a vehicle at a time early in the product lifecycle. I encourage NHTSA to increase its emphasis on driver notification for suboptimal performance, first mentioned on page 8, to address problems that arise overtime. In the same way that our oil light, engine light, and gas light have all been standardized, I assume we will have standards to ensure general public safety. I also assume that when products are ready to launch, there will be additional guidance for consumers regarding annual maintenance responsibilities.

Finally, I would like to voice support of the AV TEST Initiative, especially the “online, public-facing platform for sharing ADS road testing activities”, indicated on page five of the Federal Register entry. The general public deserves clear and up-to-date knowledge to better understand how ADS will impact their local roads. This information should also extend to measures of risk calculation. I encourage the NHTSA framework to include metrics that would more transparently communicate to the public how a particular vehicle calculates crash avoidance maneuvers, and, more importantly, how a vehicle ethically calculates how to minimize damage when a crash is unavoidable (trade-offs), referenced on page 7.