

April 15, 2021

Dr. Steven Cliff, Acting Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Dear Acting Administrator Cliff:

Re: Occupant Protection for Automated Driving Systems, Docket No. NHTSA-2021-0003

The undersigned organizations write to request that the National Highway Traffic Safety Administration (“NHTSA”) complete its review of the final rule on Occupant Protection for Vehicles with Automated Driving Systems (“Occupant Protection Final Rule”) that was originally signed on January 13, 2021, and publish the final rule in the Federal Register without undue delay. As some of the undersigned organizations expressed in our respective comments in response to the Notice of Proposed Rulemaking (“NPRM”) on Occupant Protection for Vehicles with Automated Driving Systems, we believe that the Occupant Protection Final Rule will help pave the way for the safe deployment of autonomous vehicles (“AVs”) that lack manual controls and thereby help bring the benefits of AVs to the public sooner.¹ The final rule will in no way diminish the important occupant protections provided by the existing crashworthiness Federal Motor Vehicle Safety Standards (“FMVSS”). We therefore encourage NHTSA to finalize and publish the Occupant Protection Final Rule in the near future.

As NHTSA has recognized, AVs may offer substantial safety and mobility benefits, holding the potential both to save lives and to change the way we drive. An estimated 94% of all crashes are due to human error, including reckless, drunk, and distracted driving. The United States is home to millions of individuals—including seniors and those with visual impairments—who would benefit greatly from the increased safety and mobility that AVs would provide. Moreover, self-driving technology has the potential to usher in a new era of mobility, with incredible potential to make America’s transportation system safer and more efficient.

A federal framework that helps advance the safe and timely deployment of AVs at scale will bring these benefits to the public sooner. We therefore respectfully request that NHTSA complete its review of the Occupant Protection Final Rule with haste to allow the benefits of the final rule to be brought to the public and to enable NHTSA to further focus on other important work related to automated driving systems. We are grateful for NHTSA’s efforts to identify and address regulatory barriers to deploying vehicles equipped with automated driving system technologies by reviewing and amending existing FMVSS and FMVSS test procedures. We support the continuation of those important efforts and look forward to the publication of the Occupant Protection Final Rule.

Sincerely,

Alliance for Automotive Innovation
Consumer Technology Association
U.S Chamber Technology Engagement Center (C_TEC)
Self-Driving Coalition for Safer Streets

¹ U.S. Dep’t of Transp., Nat’l Highway Traffic Safety Admin., Occupant Protection for Automated Driving Systems, Notice of Proposed Rulemaking, Docket No. NHTSA-2020-0014, 85 Fed. Reg. 17624 (Mar. 30, 2020), <https://www.govinfo.gov/content/pkg/FR-2020-03-30/pdf/2020-05886.pdf>.