

March 31, 2021

Steven Cliff  
Acting Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE  
West Building, Ground Floor, Room W12-140  
Washington, DC 20590-0001

Via: <https://www.regulations.gov>

**Re: Docket No. NHTSA-2020-0106: Framework for Automated Driving System Safety**

Dear Acting Administrator Cliff:

The Specialty Equipment Market Association (SEMA) appreciates this opportunity to provide comments on the Agency's advanced proposed rule to develop a framework for Automated Driving System (ADS) safety. SEMA's comments focus on information availability to the automotive aftermarket in the coming years to ensure that vehicles can be independently serviced, repaired, and modified as new ADS-related technologies emerge.

SEMA represents the \$46 billion specialty automotive industry comprised of 7,500 mostly small businesses nationwide that manufacture, retail, and distribute custom parts and accessories for motor vehicles. The industry produces performance, restoration, and enhancement parts for use on passenger cars and trucks, collector vehicles, racecars, and off-highway vehicles. Products range from wheels and tires to engines, exhaust systems, lighting equipment, suspensions, truck caps, leather seating, mobile electronics, and more.

SEMA welcomes NHTSA's request for automotive community feedback as the agency seeks to create a regulatory framework for ADS. The advance proposed rule that has been issued seeks to identify major ADS elements and potential approaches for addressing safety issues.

NHTSA has identified four core ADS functions: sensing, perception, planning, control. The vehicles will be connecting with other vehicles (V2V) and with everything else (V2E). The vehicles will also incorporate Advanced Driver Assistance Systems (ADAS) to help sense their surroundings and respond appropriately.

While the rulemaking is focused on ADS safety, ADAS technology is intrinsically linked to ADS development, and ADAS technologies are already being installed in new vehicles. ADAS hardware and software may also be retrofit into older vehicles. ADS and ADAS incorporate cameras, radar, LiDAR, GPS, and other sensing devices. ADAS technology includes automatic braking, lane departure and centering, adaptive cruise control, and automated lighting.

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As vehicle technology becomes more complex, it is also becoming more electronic-based, depending on software and computer chips to drive the wheels and tires. An explosion of data is being communicated within the vehicle, to other vehicles, and to the surrounding infrastructure.

International standards for governing the exchange of ADS and ADAS communications and data is being simultaneously addressed by the automakers and suppliers, NHTSA and industry standard setting organizations such as the SAE International (SAE), International Organization for Standardization (ISO), and Underwriters Laboratories (UL). As the agency moves forward to refine a regulatory structure for both ADS and ADAS, SEMA wants to ensure that the collaborative pathway for sharing data and technical information includes the aftermarket. Making sure that vehicles can be independently serviced, repaired, and modified while maintaining the operational status of the ADAS and ADS technologies needs to be part of the conversation.

The automotive community is simultaneously tackling cybersecurity concerns for which NHTSA has developed a best practices document. This topic also requires a collaborative approach within industry, government agencies and industry standard-setting organizations whereby vehicle systems and data are protected while vehicle owners still have the freedom to legally modify and repair their vehicles as they see fit.

While NHTSA has requested public guidance on developing a framework for ADS safety, SEMA believes ADAS and automated driving are commingled. As the agency works with industry stakeholders to create a regulatory overlay for both topics, SEMA has taken this opportunity to proactively focus attention on an issue to be addressed, namely ensuring the ability to have a vehicle independently serviced, repaired, modified.

Thank you again for this opportunity to provide comments. Feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Ingber', with a long horizontal flourish extending to the right.

Daniel Ingber  
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