



April 1, 2021

Docket Management Facility  
M-30, U.S. Department of Transportation  
West Building, Ground Floor, Room W12-140  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590.  
Docket ID: NHTSA-2020-0106

Subject: Response from New Flyer – NHTSA Docket ID 2020-0106

Dear Acting Administrator Steven Cliff,

On behalf of [New Flyer of America Inc.](#) (“New Flyer”), this letter is in response to the advanced notice of proposed rulemaking, Framework for Automated Driving System Safety.

New Flyer is North America’s largest transit bus manufacturer and provider of mass mobility solutions (buses, technology, infrastructure, and workforce development), and is a subsidiary of [NFI Group Inc.](#) (“NFI”). Driven by 8,000 people across 10 countries, NFI is one of the world’s largest independent bus and coach manufacturers, currently meeting today’s urban demands for scalable smart mobility solutions. Together, NFI is enabling more livable cities through connected, clean, and sustainable transportation, and collectively, our organization is active in various automated vehicle programs and are proudly associated with the Federal Transit Administration’s related active programs.

Most notably, New Flyer is in the process of [deploying three SAE 3016 Level 4 capable zero-emission buses with the Connecticut Department of Transportation on its CTfastrak bus rapid transit corridor](#), a program that was funded in part through the U.S. DOT’s Integrated Mobility Innovation. In addition, New Flyer deployed North America’s first automated heavy-duty transit bus in January 2021, the [Xcelsior AV™](#). We are proud to have a valued and experienced technology partner, [Robotic Research](#), in collaborating on our AV product and program.

New Flyer’s guiding principle for any and all Advanced Driver Assist Systems (“ADAS”) is to increase the capable safety and reliability of public transit from Level 1 – Level 5. As a result, we are active in supporting the American Public Transportation Association and its related technology committees. In addition, our engineering team maintains active involvement in various SAE International technical committees on automated and ADAS matters.

New Flyer enthusiastically supports NHTSA’s vision of regulatory authority to encourage the focus on safety of automated driving systems (“ADS”) as the technology continues to develop, while focusing this framework on the functions of an ADS that are most critical for safe operation.



NEW FLYER OF AMERICA

We agree with the approach by NHTSA of focusing this effort toward the four primary functions of ADS, which are:

- 1) How ADS receives information about its environment through sensors (“sensing”),
- 2) How ADS detects and categorizes other road users (vehicles, motorcyclists, pedestrians, etc.), infrastructure (traffic signs, signals, etc.), and conditions (weather events, road construction, etc.),
- 3) How the ADS analyzes the situation, plans the route it will take on the way to its intended destination, and makes decisions on how to respond appropriately to the road users, infrastructure, and conditions,
- 4) How the ADS executes the driving functions necessary to carry out that plan (“control”) through interaction with other parts of the vehicle.

We are appreciative to NHTSA for envisioning the output of this framework. While this will undoubtedly result in necessary and important regulations for ADS we seek to work with the Administration to explore ways to avoid creating unnecessary barriers to innovation or unintended safety risks.

New Flyer stands ready to cooperate and participate in the ADS framework for NHTSA and we look forward to participating in any way we can provide value.

Sincerely,

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