



Automotive Safety Council

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April 9, 2021

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor
Room W12-140
Washington, DC 20590-0001

[Docket No. NHTSA-2020-0109]

RIN: 2127-AM04

ANPRM – Federal Motor Vehicle Safety Standards: Test Procedures

Subject: Reopening of ANPRM seeking public comment on whether any test procedures for any Federal Motor Vehicle Safety Standards (FMVSS) may be a candidate for replacement, repeal, or modification for reasons other than for considerations relevant only to automated driving systems (ADS).

The Automotive Safety Council (ASC) is an industry trade association of 45 of the world's leading suppliers of Autonomous, Crash Avoidance and Occupant Protection automotive safety systems to the automobile industry. The mission of the Automotive Safety Council is to improve the safety of people through-out the world through the development, production and implementation of the latest automotive safety equipment by preventing accidents, protecting occupants and pedestrians when in a collision and to notify emergency responders after the collision when necessary.

The ASC is providing additional comments to the recently reopened comment period for the ANPRM seeking public comment on whether any test procedures for any Federal Motor Vehicle Safety Standards (FMVSS) may be a candidate for replacement, repeal, or modification for reasons other than for considerations relevant only to automated driving systems (ADS) (Docket No. NHTSA-2020-0109). The ASC appreciates the opportunity to comment on this topic

General Comments:

The Automotive Safety Council appreciates that NHTSA seeks to improve the FMVSS test procedures and remove unnecessary burdens. In addition to the comments provided in this response, we feel there are significant opportunities to update the FMVSS beyond the scope of this ANPRM to address new technologies, improve occupant safety, and remove obsolete content in the regulations.

Testing Procedures:

FMVSS 118:

1. For the force gauge setup: Removal of the 65N/mm spring rate requirement. Other world specs cite a 10 N/mm spring rate.
2. Add clarity to how the test rod should be held in relation to the window and sunroof movement.
 - a. Some OEMs follow that the rod should be held in a rigid way and perpendicular to the glass movement. Others allow the rod to be held at an angle and come into contact with the inner and outer sealing of the upper window seal.
3. S6 3.c.:

(c) Any actuation device for closing a power-operated window must operate by pulling away from the surface in the vehicle on which the device is mounted. An actuation device for closing a power-operated window must operate only when pulled vertically up (if mounted on the top of a horizontal surface), or out (if mounted on a vertical surface), or down (if mounted on the underside of an overhead surface), or in a direction perpendicular to the surrounding surface if mounted in a sloped orientation, to cause the window to move in the closing direction.

Current language would prevent using a mobile device, HMI, and others as these screens cannot satisfy.

- Two scenarios:
 1. Interior operations with mobile device.
 2. Remote operations with mobile device.

In conclusion, the ASC welcomes this opportunity to comment on the ANPRM to improve Federal Motor Vehicle Safety Standard (FMVSS) test procedures. We welcome any invitation to visit the NHTSA office for a detailed discussion of these comments should the need arise.

Sincerely,

A handwritten signature in black ink, appearing to read "D.P. Campbell". The signature is fluid and cursive, with a prominent loop at the end.

Douglas P. Campbell
President
Automotive Safety Council