

## **Lucid Motors Inc. - Comments**

Lucid Motors Inc. (Lucid) appreciates this opportunity to submit comments on the Notice issued by NHTSA on December 9, 2020 seeking comment on test procedures in the FMVSS that should be replaced, repealed or modified. We appreciate NHTSA's decision to review the FMVSS test procedures and encourage the agency to remove requirements that provide no safety benefits to the public but impede the development of automotive innovations.

We concur with the comments submitted by Robert Bosch LLC (Bosch) on February 8, 2021 regarding FMVSS 108. We agree with Bosch that the tests in FMVSS 108 are an impediment to the adoption of adaptive driving beam (ADB) headlights in the United States and that ADB will improve safety on America's highways. We also support Bosch's recommendation that NHTSA align FMVSS 108 with UNECE 48.

Lucid further submits that in addition to its review and revision of FMVSS test procedures, NHTSA should evaluate the test procedures and requirements specified for the bumper standard in Part 581. In its report last year on Vehicle Bumper Performance in Part 581 Versus Pedestrian Leg Protection, DOT HS 812942 (June 2020), NHTSA found that compliance with the test procedures prescribed in Part 581 will result in more lower leg injuries than if manufacturers comply with EuroNCAP test procedures. In keeping with its mission of reducing injuries on America's roads, NHTSA should relax the Part 581 bumper standard requirements and test procedures to align them with the EuroNCAP test procedures.

Thank you for considering our comments in response to this Notice. If you have any questions or wish to discuss these comments, please do not hesitate to contact me at [kevinvincent@lucidmotors.com](mailto:kevinvincent@lucidmotors.com) or 703.822.3390.

Sincerely,

O. Kevin Vincent  
Associate General Counsel