

# Comment from Adam Philipot

Posted by the **National Highway Traffic Safety Administration** on Jun 21, 2021

I believe that side view cameras should be allowed to replace required outside mirrors.

## 1. Flexibility in design

Cameras provide flexibility in design that mirrors cannot provide. Mirrors require a direct line of sight between the driver and rear of the vehicle. Cameras can be positioned in a location that optimizes the field of view based on the vehicle design.

Cameras also allow flexibility in the positioning of the viewing location (display) to a position that potentially reduces the time a driver is required to take their eyes off the road in front of them.

## 2. Increased pedestrian safety

In passenger vehicles safety of pedestrians can be improved by significantly reducing the potential area of impact.

## 3. Improved fuel/energy efficiency, reduce emissions

Camera design can improve vehicle aerodynamics, which will both reduce fuel/energy consumption, which will in turn reduce emissions.

## 4. Ability to use software to dynamically adjust to the current driving situation

With cameras vehicle software can dynamically adjust the view based on the current conditions to improve safety while maneuvering in restricted areas, such as parking garages.

## 5. Reliability concerns

Reliability of modern cameras and displays have been proven with current OEM systems that have been in use for many years, and have shown in many cases to be more reliable than conventional mirrors.