



# Automotive Safety Council

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

National Highway Traffic Safety Administration

[Docket No. NHTSA-2019-0082-0024]

**Agency Information Collection Activities; Notice and Request for Comment; Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors**

Subject: **Request for Comments:**

The Automotive Safety Council (ASC) is an industry trade association of 48 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 comments to the recently published RFC document requesting additional comments pertaining to Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors. The ASC appreciates the opportunity to comment on this topic.

## Overall Comments:

The ASC appreciates NHTSA's evaluation of the previous comments made by ASC to the original RFC NHTSA- 2019-0082-0001. We hope that if this initial evaluation of cameras replacing mirrors is successful, NHTSA will expand the research to include those previous ASC suggestions.

## New Comments:

As explained in the NHTSA RFC, *“Participants will drive a test vehicle equipped with a camera-based system in place of outside rearview mirrors, an original equipment outside rearview mirror system, or a combination of both. The research will involve track-based and on-road, semi-naturalistic driving in which participants will drive vehicles in multilane traffic scenarios while using the outside rearview mirrors or alternative system during lane changes and other typical driving situations.”*

- As consumers are generally unfamiliar with driving in a test track environment, to isolate feedback related to the new technology as much as possible, ASC suggests that test participants driving camera-equipped vehicles have the opportunity for a short orientation drive in either:
  - a) their own vehicles, or
  - b) a side-mirror equipped rental vehicle of a similar type to the evaluation vehicle fitted with cameras instead of side mirrors (may be simpler from an insurance perspective) in advance of the test track session. This will provide an opportunity to familiarize themselves with conventional mirror technology in the test track environment in the same vehicle type as the test vehicle. This may help to reduce variability from “normal” mirror usage and driving behaviors due to the unfamiliar test environment and vehicle type and help isolate the participant response to just the camera technology in the test of the camera equipped system vehicle.
- The study should ensure sufficient time for the drivers to get acquainted with the system.

In conclusion, the ASC welcomes this opportunity to comment on Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors. We welcome any invitation to visit the NHTSA office for a detailed discussion of these comments should the need arise.

Sincerely,



Douglas P. Campbell  
President  
Automotive Safety Council