



June 21, 2021

VIA ELECTRONIC FILING

Dr. Steven Cliff
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Washington, D.C., 20590

RE: Agency Information Collection Activities; Notice and Request for Comment; Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors; Docket No. NHTSA-2019-0082, 86 FR 27952 (May 24, 2021)

Dear Acting Administrator Cliff,

The Alliance for Automotive Innovation ("Auto Innovators") appreciates this opportunity to provide input to the National Highway Traffic Safety Administration ("NHTSA") on the notice of Agency Information Collection Activities as required under the Paperwork Reduction Act ("PRA Notice").

Auto Innovators' members¹ have long been vocal proponents of Camera Monitoring Systems ("CMS") and support the Agency's research into this innovative technology. We stand by ready to assist the Agency's research to the best extent possible and encourage NHTSA to engage with industry to resolve any issues or concerns that the agency may have.

As NHTSA is keenly aware, some of our members currently have CMS already deployed in other markets that comply with established international standards, namely ECE R46 and ISO 16505. Wherever possible, Auto Innovators strongly supports harmonization with existing international standards and urges the agency to consider these well-established systems in their ongoing research efforts.

Because CMS has already seen success in other markets, the Auto Innovators are hopeful that its incorporation into the Federal Motor Vehicle Safety Standards will be seamless and without undue delay. The potential benefits to safety and to GHG/fuel economy support the need for prompt action. Therefore, we ask that NHTSA prioritize its CMS research and rulemaking processes in order to achieve this goal.

As noted above, the Auto Innovators extends its offer to assist the agency in any aspect of its research that would help to bring CMS into the US market. We are willing to meet with the Agency if so desired in order to foster an open dialogue and we are planning to follow up with supplemental comments stemming from the 2019 ANPRM² and/or existing NHTSA research to

¹ The Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. Its members are listed as follows: Aisin Group, APTIV, Argo AI, BMW Group, Bosch, Byton, Cruise, Denso, Ferrari, Ford, GM, HARMAN, Honda, Hyundai, Infineon, Intel, Isuzu, Jaguar Land Rover, Karma, Kia, Local Motors, Luminar, Mazda, Mercedes-Benz, Mitsubishi Motors, Nissan, NXP, Panasonic, Porsche, RV Industry Association, Sirius XM, Stellantis, Subaru, Suzuki, Texas Instruments, Toyota, Volkswagen Group of America and Volvo.

² Docket No. NHTSA-2018-0021; 84 FR 54533 (October 10, 2019)

address open concerns identified since that time. Should you have any questions, please do not hesitate to reach out to me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Hernandez". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Hernandez
Senior Director, Safety
Alliance for Automotive Innovation

CC Ryan Posten
Cem Hatipoglu
Elizabeth Mazzae

