

## **Comment from Philip Koopman**

NHTSA should keep collecting and acting upon data in accordance with Standing General Order 2021-01. Doing so is essential to performing its mission of ensuring public road safety. Additionally, NHTSA should add to its data collection requirement reporting of traffic law violations that the manufacturer is aware of as a reportable incident, including especially traffic law violations that occur during public road testing.

There have been numerous social media videos of road testing vehicles running stop signs, running red lights, and driving recklessly due to operator inability to compensate for dangerous vehicle automation behavior. The fact that this is happening cannot be a secret to manufacturers, especially since on at least some vehicles test drivers are using manufacturer-provided mechanism to report the incident. (If the manufacturer ignores those reports, then even the excuse that reckless testing somehow results in safety later is invalid.)

Having NHTSA react to reckless driving due to failures of test drivers or drivers of ordinary Level 2 features to be able to compensate for defective vehicle behavior should be an additional traffic safety priority.

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Background: Working on self driving car safety for 25 years.