

Comment from Robert Cunningham

Posted by the **National Highway Traffic Safety Administration** on Mar 14, 2022

I am strongly in favor of using cameras and screens in place of all rear-view mirrors presently required in all vehicles (not just automobiles). The technical and functional benefits have already been discussed at length and are impossible to ignore.

I installed front and rear drivecams in my car after incorrectly being declared at fault in a minor accident. The system I chose also included a full-sized screen that fit over the center mirror that normally displays the rear camera while driving. I was surprised by the number of benefits provided by this system:

1. The wide-angle rear view greatly reduced the size of my left and right blind spots.
2. The wide-angle rear view also made me less agitated by tailgaters.
3. The camera has better night-sight capabilities than my eyes.
4. The camera and screen together serve to eliminate glare from the rear, especially at night.

I believe my benefits would only increase were I to also have cameras and screens to replace my side mirrors.

However, there are risks that must be mitigated: Technology can and will fail (ref: Murphy's Law). In my present system, should the screen or camera fail I can simply remove the screen and use the center mirror.

To mitigate the risk of failure, I would propose that temporary mirrors be provided with every vehicle that can be attached to external and internal mount points when needed. These mirrors should provide the same wide-angle FoV (Field of View) as the cameras, rather than that presently required for OEM mirrors.

These mirrors can also be strictly for temporary use until repair, much like the current reduced-size spare tire, meaning the mirrors may be lightweight and inexpensive. They could be mounted to the forward edge of the front driver and passenger side windows, or to appropriate fixed clip points.

With this mitigation in place, I believe there would be every reason to permit (not require) side and center rear cameras with screens to replace fixed mirrors