

Comment from James Seedorf

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

There is clear evidence that camera-based rear visibility is safe and reliable. Several other countries have allowed them and shown that automakers and consumers will use them.

Cameras have the ability to show a much improved field of view with increased clarity in adverse weather. There are so many safety benefits the question should not be if we should allow digital options to replace mirrors instead we should be asking if we can ban mirrors and/or require digital options on all new vehicles like we do with back-up cameras.

Rain/snow/fog on the windows will not obscure the view through the camera. Larger vehicles like Semi-Trucks and Busses can place cameras farther forward and lower than mirrors which completely eliminates the dangerous blind spots associated with such vehicles. This is further evidence that such systems should not simply be allowed but should be required on all new vehicles.

Driver head position has no effect on the camera's field of view which is another major benefit. Thousands of vehicles are sold every year without power-adjustable mirrors and these vehicles pose extreme danger to the public when operated by different drivers who do not take the time properly adjust the mirrors. Requiring digital cameras will greatly improve public safety by eliminate the ability to cheap out on important safety features.

Lastly, these systems can have significant impacts on drag/aerodynamic efficiency. Even a 0.1% improvement in transportation efficiency in the USA will reduce CO2 emissions by more than a million tons of CO2 annually.

Simply put, there are many safety and functional pros to requiring digital cameras for rear-views and no real cons. All theoretical cons which will stem from increased complexity and unreliability can be addressed through regulation and recalls as with all essential safety systems like airbags, seatbelts, adaptive cruise control, ect.