

## Comment from Patrick McMahon

Included below are some comments about various aspects of the NHTSA New Car Assessment Program

### Blind Spot Warning

<https://www.federalregister.gov/d/2022-04894/p-310>

16 – The BSW in this section seems exclusively focused on side blind spots, but an increasing number of vehicles are designed with significant forward blind spots that pose significant risks when the vehicle is starting, especially to children. These types of blind spots should also be addressed and vehicle designs that create such blind spots (and also make pedestrian collisions more fatal by directing victims under the tires instead of onto the hood) should be strongly discouraged and given poor safety ratings.

### Pedestrian Automatic Emergency Breaking

While speeding may not be a factor in the cause of some crashes, although I think it probably is more of a factor than reported, it is most definitely a factor in the injury severity, particularly for pedestrian and bicycle crashes.

<https://www.federalregister.gov/d/2022-04894/p-377>

23 – Given that higher speed collisions are significantly more likely to be fatal, it seems like PAEB should be tested at speeds up to 70 kmh, which are common on surface roadways where pedestrians are present.

34 – NHTSA should look at how vehicle design would influence the survivability of a pedestrian/vehicle collision, given the increasing number of vehicles being sold with hoods that are very high and that prevent pedestrians from rolling onto the hood but that instead direct pedestrians under the vehicle. Such vehicle designs should be discouraged and given poor safety ratings because of the risk that they pose.

### Intelligent Speed Assist

<https://www.federalregister.gov/d/2022-04894/p-758>

80 – NHTSA should be strongly pushing for ISA in all new vehicles that both alerts drivers they are exceeding the speed limit and then that actively work to slow the vehicle down to within 110% of the posted speed limit.

81 – Intelligent Speed Assist is especially important in areas where drivers will be encountering people walking and bicycling, specifically on surface roadways rather than on separated freeways.

82 – While consumers may be wary of or frustrated with ISA systems, the amount of lives saved by widespread implementation of such a system would be significant. ISA systems could first warn drivers that they were exceeding the speed limit and determine if the driver responds and lowers their speed to within 110% of the speed limit before actively working to reduce the speed automatically.

83 – I think that ISA is the most effective and appropriate way for NHTSA to prevent excessive speeding and reduce both the number and severity of vehicular crashes. While many other NHTSA efforts have worked to protect individuals in the event of a crash, ISA can help reduce the frequency of crashes and the severity of those crashes.