Department Of Transportation
National Highway Traffic Safety Association
New Car Assessment Program
NCAP Division Chief
Jennifer N. Dang

Dear Ms. Jennifer Dang,

I am writing in regards to RFC Federal Register Document Number 2022-04894 wherein there is very apparent bias to continue with the NCAP 5-Star brand with an overall rating and a 5 to 10 year road map that follows the industry market developments of safety innovations with no apparent means to inspire development of any additional safety technology beyond minimum NHTSA requirements as exemplified in this RFC notice.

Further with only a single brief mention of “one commenter suggested a 10-star rating system” as the only reference to alternate considerations in regards to using half-stars with the 5-star brand to total 9 to 11 tiers, there is no obvious inspiration to comment beyond what has been previously submitted into the Federal Register in regards to a competitively driven NCAP 10-star speed safety rating system.

However it is with some hope that NCAP will become more than just a agency managed free marketing system for the automotive industry as demonstrated in the 2022-2023 agenda of this RFC and instead fulfill the potential as a ratings tool for the NHTSA drive for safety in order to inspire globally leading innovations toward zero road fatalities with competitively driven advancements in both crash protection and collision avoidance technologies as exemplified in the NCAP 10-star speed safety ratings.

Please see and reference my past, present, and future NCAP support documents submitted into the Federal Register as an independent safety advocate, that are listed to date on page 2 of 2 in this document.

Sincerely,

David DeVeau
DEVCO Design & Development

Federal Register Submittal Documents: NCAP Support

NHTSA-2016-0090-0965_Comment
NHTSA-2016-0091-0005_Comment
NHTSA-2018-0055-0005_Attachment_1, 2, and 3
NHTSA-2018-0055-0011_Attachment_1
NHTSA-2018-0055-0074_Attachment_1
NHTSA-2018-0055-0077_Attachment_1 and 2 (NCAP Meeting)
NHTSA-2019-0016-0013_Attachment_1
NHTSA-2019-0017-0007_Attachment_1
NHTSA-2019-0027-0008_Attachment_1
NHTSA-2019-0036-0059_Attachment_1
NHTSA-2019-0036-0063_Attachment_1
NHTSA-2019-0102-0019_Attachment_1
NHTSA-2019-0179-0004_Attachment_1, 2, 3, and 4
NHTSA-2020-0070-0002_Comment
NHTSA-2020-0070-0023_Other Document_Attachment_1 and 2
NHTSA-2020-0106-0021_Attachment_1, 2, 3, and 4
NHTSA-2020-0106-0659_Attachment_1
NHTSA-2020-0109-0016_Attachment_1

NOTE: Particular regards to possibly showing less stars than in previous ratings and relocating the NCAP safety label; consumers are intelligent enough to easily figure out that the newer very clear NCAP 10-Star Speed Safety Rating System is clearly accelerating Road Safety Forward.

Federal Register Reference Documents: NCAP

NHTSA-2021-0002-0001_RFC for 2022-2023 Agenda and Requirements
NOTE: There must be ability for industry to go beyond NHTSA limits in testing with pre-approved conditions of self-certified and third-party testing in order to enable development of improved and additional safety features.

NHTSA-2021-0033-0001_RFC for Public Research Collection Information
NOTE: If bias is not part of this consumer research there will be no doubt that a 10-Star Speed Safety Ratings System is much easier to understand as well how only this type of system will drive competition for our road vehicle safety with very clear ability to acquire more stars for safer cars.