



March 25, 2022

Dr. Steven Cliff
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

RE: Request for comments (RFC); New Car Assessment Program (NCAP), NHTSA Docket No. 2022-0002, 87 FR 13452 (March 9, 2022)

Dear Deputy Administrator Cliff:

The Alliance for Automotive Innovation (Auto Innovators) and the Motor & Equipment Manufacturers Association (MEMA) are writing to request a 30-day extension of the public comment period on the March 9, 2022, Federal Register notice and request for comment (RFC) on proposed updates to the New Car Assessment Program (NCAP) and the corresponding NCAP roadmap.

This additional time is necessary to allow Auto Innovators and MEMA to conduct a detailed review of the notice and develop responses to extensive number of questions and issues included within the RFC. As you know, the notice addresses several complex topics, including the proposed crash avoidance technologies and related test procedures, the ADAS rating system (and the use of the 5-star rating), the development of the aforementioned roadmap, emerging technologies, other program updates and activities, and Monroney label update considerations. While NHTSA's RFC request is straightforward, conducting the in-depth review and analysis necessary to develop informed feedback is challenging given the comprehensive nature of the notice, which includes more than 100 questions.

As a result, we request a 30-day extension of the May 9, 2022, deadline in order to provide more detailed, constructive comments, which we are hopeful will minimize any follow up agency actions needed to address open questions on this important update to the program.

Auto Innovators and MEMA appreciate the opportunity to provide input to NHTSA on this important issue and we are hopeful that the additional time provided will allow for more fully developed feedback to support the agency's next steps.

We look forward to any follow up with the agency to discuss this request further.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Schmidt".

Scott Schmidt
Vice President, Safety Policy

A handwritten signature in black ink, appearing to read "Leigh S Merino".

Leigh Merino
Vice President, Regulatory Affairs