



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

MEMORANDUM

May 26, 2022

The Honorable Pete Buttigieg, Secretary
U.S. Department of Transportation,
1200 New Jersey Avenue SE,
West Building Ground Floor, Room W12-140,
Washington, DC 20590-0001

Re: Docket # NHTSA-2021-0002, Request for Comment for New Car Assessment Program

Dear Secretary Buttigieg:

I applaud the US Department of Transportation (USDOT) for adopting a zero roadway fatalities goal in the new National Roadway Safety Strategy. The new strategy's use of the safe system approach brings necessary alignment between the federal government and Vision Zero initiatives in Montgomery County and the State of Maryland. While Montgomery County can make progress in most of the safe system approach emphasis areas, an area with significant control by the federal government is *Safer Vehicles*. As part of the update and roadmap for the New Car Assessment Program (NCAP), I recommend the following areas for consideration:

- **Protection for people outside of the vehicle.** As outlined in the National Roadway Safety Strategy, addressing vehicle safety for people outside the vehicle can curb the unconscionable rise in pedestrian deaths in the United States. USDOT should take a comprehensive approach to improving safety for non-motorists including automatic emergency braking, lane keeping assistance, and vehicle grill design/height.
- **Technology that limits distracted and impaired driving.** USDOT must put safety at the forefront in determining technology use in the vehicle. USDOT should add to its roadmap ways to limit distraction caused by “infotainment” systems, which have higher crash risks compared to adjusting traditional in-vehicle climate control or radio. Additional technology such as alcohol detection systems could have immediate impacts and save 10,000 lives lost to impaired driving each year.

- **Developing incentives or standards for universal connections to airbag control modules (ACMs).** In the area of post-crash care and investigation, USDOT should require or incentivize vehicle manufacturers to standardize connector cables to airbag control modules and ability to retrieve the data without having to purchase proprietary hardware and software from vehicle manufacturers. To retrieve data from vehicles involved in a crash, our county police use industry standard hardware and software to connect to the airbag control module (the main device in vehicles that record event data up to 5 seconds prior to a high impact crash) which supports download from over 50 vehicle brands. Data can be retrieved either through the data link connector (DLC) port located below the steering wheel or a direct connection to the airbag control module if the port or the vehicle's electrical system are damaged. While the OBD/DLC connection is standardized across vehicles, connections and the ability to download data from airbag control modules are not. The multiple types of connections require investigating agencies to have multiple cables to connect with different makes, models, and model years. The hardware currently used by our county police has up to 85 different cables that can be purchased to connect to vehicles, with each cable costing around \$165. Vehicle manufacturers such as Tesla, Kia, and Subaru have their own proprietary event data retrieval hardware not supported by our county police's current hardware.

Thank you for your partnership in saving lives on our roadways.

Sincerely,



Marc Elrich
County Executive

ME:wh

cc: Richard Madaleno, Chief Administrative Officer, Office of the County Executive
Earl Stoddard, Assistant Chief Administrative Officer, Office of the County Executive
Chris Conklin, Director, Montgomery County Department of Transportation
Marcus Jones, Chief, Montgomery County Police Department
Wade Holland, Vision Zero Coordinator, Office of the County Executive