

Comment from Troy Kranz

Posted by the **National Highway Traffic Safety Administration** on Jul 6, 2022

I have been using event data recorder (EDR) data to help investigate and reconstruct vehicle crashes since the early 2000s. EDR data is immensely valuable to properly and thoroughly understanding a crash event. It has great value whether it is used for criminal prosecution (or defense), civil lawsuits or to help better understand vehicle crashes. For all of those reasons, I applaud and support NHTSA's proposed rule here. Having 20 seconds of pre-event data, recorded every 0.1 of a second, would allow me to better understand the entire crash event. This additional data is valuable in all aspects of crash reconstruction and analysis. I use EDR data regularly for both criminal justice purposes and for my private crash investigation company. The addition of 15 seconds of pre-crash data would give me more confidence in my analysis of what are often complex crash events.

Although I do support this proposed rule wholeheartedly, I would strongly implore that NHTSA make other minor changes to this rule. The rule was last changed almost a decade ago, and the amount of data that a vehicle captures about a crash event has grown exponentially during that time. NHTSA should consider expanding this rule to cover all newly manufactured vehicles (without limiting them to passenger vehicles under a certain weight). New electric vehicles, such as the Rivian R1T, are over the 5500 pound limit mentioned in the current rule, exempting them from the rule. (Rivian apparently does not plan on voluntarily complying with Part 563 as of today.) Surely a vehicle such as that was meant to fall under the umbrella of 'passenger vehicle'. I also think that NHTSA should expand the data tables in part 563.7 and 563.8 to include new, emerging data elements. Any video or photographs captured by the vehicle should also be stored in a crash event and available for retrieval.