

## **Comment from CHRIS MEDWELL**

Posted by the **National Highway Traffic Safety Administration** on Jul 7, 2022

While I applaud this proposed rule change, I believe that another aspect of the rule is perhaps more important to revise - that is the definition of trigger threshold that specifies a 5 mph  $\Delta V$  within 150 msec. This provision has had the unfortunate effect of prompting most manufacturers to program the EDR function to ignore (not record) non-deployment events, even if algorithm wake-up occurred and there is a non-deployment decision, if that defined recording trigger threshold was not reached. Many non-trivial crashes are excluded from recording by this provision, including nearly all pedestrian strikes & collisions with bicyclists. It is my belief that all algorithm wake-up events should be recorded, perhaps along with an "overwrite" prevention for recent events such as GM employs today. As a crash investigator I would argue that pedestrian impact investigations are even more reliant upon electronic data than other types of crashes, since the scene and vehicle evidence is often both scarce and short-lived.