



125 EAST 11TH STREET, AUSTIN, TEXAS 78701-2483 | 512.463.8588 | WWW.TXDOT.GOV

July 8, 2022

Dr. Cem Hatipoglu
Associate Administrator, Vehicle Safety Research
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590

Re: Docket No. NHTSA-2022-0044

Dear Dr. Hatipoglu:

The Texas Department of Transportation (TxDOT) is responding to a request for comment posted by the National Highway Traffic Safety Administration (NHTSA) on May 10, 2022, in the *Federal Register* regarding your intention to seek approval from the Office of Management and Budget to extend information collection on a field study of heavy vehicle crash avoidance systems (NHTSA-2022-0044).

TxDOT believes that collecting information from users, while ensuring the privacy of that information through NHTSA's use of Institutional Review Board-approved informed consent, and on the efficacy of heavy vehicle crash avoidance systems is inherent to NHTSA's role in understanding and establishing standards for vehicle safety. It is critical that NHTSA complete its studies to capture the most effective and valuable advanced driver assistance systems (ADAS) available and use those findings and that data to establish new standards for freight safety.

Implementation of ADAS technologies has the potential to improve freight and traffic safety, provide an extensive return on investment in terms of lives saved, decrease medical and vehicle repair costs, and allay cost avoidances by allowing first responders to address critical safety incidents. The findings of NHTSA's studies may also provide the foundational knowledge needed as freight continues to move toward fully autonomous systems. This information could identify solutions resulting in the best crash avoidance data for autonomous vehicles.

TxDOT appreciates the opportunity to respond to this request for comments. If you have any questions, please call me at (512) 305-9515 or you or your staff may contact Melanie Alvord, Director, Federal Affairs, at (512) 944-5135 or via email at Melanie.Alvord@txdot.gov.

Sincerely,

Marc D. Williams, P.E.
Executive Director

cc: Darran Anderson, Director, Strategy and Innovation, TxDOT
Melanie Alvord, Director, Federal Affairs, TxDOT

OUR VALUES: *People • Accountability • Trust • Honesty*

OUR MISSION: *Connecting You With Texas*

An Equal Opportunity Employer