



National Association of  
City Transportation Officials

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

**Re: General Motors-Receipt of Petition for Temporary Exemption from Various Requirements of the Federal Motor Vehicle Safety Standards for an Automated Driving System-Equipped Vehicle**

**Notice of Receipt of Petition for Temporary Exemption; Request for Public Comment; 87 Federal Register 43595, July 21, 2022**

Dear Dr. Cliff,

Pursuant to 49 CFR § 553.19, the National Association of City Transportation Officials (NACTO) files this request for a **sixty (60) day extension of the public comment period** for the request for comments noted above which is currently scheduled to conclude on August 22, 2022. NACTO represents 74 U.S. city transportation agencies, many of which host autonomous vehicle (AV) testing operations on their streets.

General Motors' petition seeks an exemption from certain requirements from no less than six Federal Motor Vehicle Safety Standards. This petition raises numerous complex technical and policy issues with implications for vehicle and traffic safety that necessitate significant analysis. Extending the comment period will permit members of the public to provide comprehensive input on the many substantial questions raised.

On the same day General Motors' petition was published in the Federal Register, NHTSA also published a second petition from the Ford Motor Company seeking an exemption from certain requirements from no less than seven Federal Motor Vehicle Safety Standards. Granting this extension is in the public interest as it will provide stakeholders with sufficient time to provide specific and comprehensive feedback to NHTSA on the distinct issues posed by both petitions.

Thank you for your attention to this matter and consideration of this request.

Sincerely,

Corinne Kisner,  
Executive Director, NACTO