



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

September 16, 2022

Mr. Nanda Narayanan Srinivasan
Associate Administrator, Research and Program Development
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Docket No. NHTSA-2022-0063

Dear Mr. Srinivasan:

The Texas Department of Transportation (TxDOT) is responding to a request for comments posted by the National Highway Traffic Safety Administration on July 20, 2022, in the *Federal Register* regarding your intention to seek approval from the Office of Management and Budget for a new collection of information on drivers' interactions with Level 2 (L2) systems in passenger vehicles.

TxDOT supports this information collection as it will provide insight into what drivers expect from their vehicle's L2 systems and their understanding of how to operate them. The data collected from this research will also help state departments of transportation identify behavioral countermeasures to communicate and educate the public on how to safely and efficiently use L2 systems.

According to the *Federal Register* notice, 180 drivers will be selected for the study, split among three groups: drivers aged 18 - 25, 35 - 55, and 70+. TxDOT seeks clarity on why drivers between the ages of 25 - 35 and 55 - 70 are excluded from the study. Additionally, motorists with "little to no experience" with L2 systems will be chosen to drive an L2 system-equipped vehicle for four weeks "to measure changes in driving patterns as well as safety-related behaviors such as distracted driving and seat belt use." In practice, however, four weeks of observation may not yield statistically sound measurements.

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: Lance W. Simmons, Chief Engineer
Michael Chacon, Director, Traffic Safety Division
Melanie A. Alvord, Director, Federal Affairs Section