

Comment from Gary Feldhus

Posted by the **National Highway Traffic Safety Administration** on Sep 21, 2022

If for no other reason NHTSA should deny allowing GM & Ford to street test additional autonomous vehicles because their plan doesn't meet OSHA's safety requirements for stationary or mobile robots. NHTSA should also partner with OSHA and utilize their robotic expertise.

Risk:

Auto companies have always tested experimental vehicles on the street with the drivers (not Company) held legally accountable right down to a valid license plate. OSHA involvement specifically applies here because GM and Ford have requested that US city streets become their work place. Public risk exists because these robots travel at high speed in an uncontrolled environment, both the robotic drivers and vehicles are experimental therefore not approved, the public is not safety trained on any aspect of these machines and members of the public will always be within range. Lastly, the request is that no human drivers be present which places public safety at high risk; very ironic since Ford fired 3000 salaried employees last month.

Have they earned your trust?

Please note that for years (and still true today) GM has taught the public that when vehicle back-up lights illuminate (and remain on) then the car is simply being unlocked. Children and many adults no longer understand that the back-up lights are primarily a warning not to walk behind a vehicle that is in reverse. Other automakers are following GM's lead, at a time when pedestrian safety is allegedly high on NHTSA's list. GM should simply have made those lights double flash then stay off.

Ford is no better with the EPA inspired stop-start technology on my 2020 Edge. When I stop the Edge it quickly shuts down and it stays off (while still in "Drive") even with my foot off the brake, and this is ok. 1) But I have no idea why opening the driver or passenger front door will restart it, still in drive without my brake input and 2) On any restart event the throttle should be deactivated until after a brake input is gone. The default now is when you half miss the brake pedal and "fat foot" the gas you are going for a ride. How do you defend that default? Note that if you wait with the engine "off" for an extended time outside a store, you easily believe you are in Park .

Closing:

Let's stop with the thought that the public forgives a drunk but never forgives a robot. Will autonomous vehicles die after 30 people die?