

September 21, 2022

Dr. Steven Cliff
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
West Building
Washington, DC 20590

RE: NHTSA Docket #: NHTSA-2022-0067-0002

Dear Administrator Cliff:

I'm writing today in support of the General Motors/Cruise request, which will help accelerate the deployment of autonomous-driving vehicles. At BraunAbility we develop transportation solutions for those with mobility challenges and disabilities. BraunAbility has grown from a modest small-town entrepreneurial venture with a handful of employees to a global company with over 1200 employees serving more than 70 countries. With the most diverse product portfolio of any mobility vehicle company in the industry, BraunAbility is able to deliver accessible transportation solutions a diverse set of needs.

Today there are 49 million Americans over age 65, and 53 million people have some form of disability. In many places across the country employment or independent living rests on the ability to drive. Self-driving vehicles will enhance mobility by creating new modes of transportation for Americans who, for various reasons, do not own or operate cars. For people with disabilities and some senior citizens, this will mean greater and safer independence – the ability to travel to work, to run errands, or to simply visit a friend or loved one.

As part of our advanced transportation activities (which I lead), we have participated in multiple projects with AV companies to develop accessible transportation solutions in this rapidly evolving segment. Recently, BraunAbility was part of the first-place team in the DOT Inclusive Design Challenge – a contest that focused specifically on driving innovation for autonomous vehicle accessible transportation. Both GM/Cruise, as well as BraunAbility are preparing to uniquely address the transportation challenges of a population that would greatly benefit from it.

As an automotive engineer (33 years at General Motors), I went through the exemption request to ensure I agreed with it. The FMVSS standards were written prior to self-driving vehicles existing. The petition is asking for the exemptions that this class of vehicle should receive. The solutions that GM/Cruise are providing address the intent of the FMVSS when a human driver is no longer part of the vehicle. We appreciate the societal benefits that AVs will bring, and it is therefore in the public interest for NHTSA to grant this petition for exemption.

Thank you for your attention to this matter.



Kevin G. Frayne
Director, Advanced Mobility Solutions
BraunAbility