



November 14, 2022

Mr. Raymond R. Posten
Associate Administrator for Rulemaking
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Washington, D.C., 20590

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Consolidated Vehicles' Owner's Manual Requirements for Motor Vehicles and Motor Vehicle Equipment [Docket Number: NHTSA-2021-0032]

Dear Mr. Posten,

The Alliance for Automotive Innovation ("Auto Innovators") appreciates the opportunity to provide input in response to the National Highway Traffic Safety Administration's ("NHTSA") notice and request for comments on the collection of information and consolidated vehicle owner's manual requirements for motor vehicles and motor vehicle equipment.¹ These comments reiterate yet to be addressed concerns communicated by Auto Innovators to the agency on this matter, and request agency action to consider the use of technology alternatives to minimize the burden of this data collection activity.²

In responding to this notice, Auto Innovators provides no specific comments on the accuracy of the agency's estimates of the burden of the proposed collection, or the validity of the methodology and assumptions used. That said, the cost and materials burden are not insignificant, as reflected in the agency's estimates as part of this notice, and typically increase with each new information approval request.

With advances in new technology there are significant opportunities to enhance the quality, practical utility, and clarity of information, and minimize the overall burden associated with this information collection activity and the corresponding regulatory requirements related to the vehicle owner's manual. To date, these approaches have not been adequately considered by the agency and we request NHTSA take meaningful action to provide compliance options that embrace a more modernized approach. This could include the use of consumer survey data to understand how owner's access relevant information about their vehicle and whether other approaches can be leveraged to provide equivalent access to information consumers find most relevant.

¹ The Alliance for Automotive Innovation ("Auto Innovators") represents automakers that produce and sell approximately 98% of all the new light-duty cars and trucks sold in the U.S. Auto Innovators is the authoritative and respected voice of the automotive industry. Auto Innovators is focused on creating a safe and transformative path for sustainable industry growth by engaging directly in regulatory and policy matters impacting the light-duty vehicle market across the country. Auto Innovators' members include motor vehicle manufacturers, original equipment suppliers, technology, mobility, and other automotive-related companies and trade associations.

² NHTSA-2021-0032-0002



The vehicle owner's manual is an important tool for providing owners with relevant information related to the safety, performance, and maintenance of a motor vehicle. As indicated in the request for comment, "the Secretary (NHTSA by delegation) is authorized, at 49 U.S.C. 30117, to require manufacturers to provide information to first purchasers of motor vehicles or items of motor vehicle equipment related to performance and safety in printed materials that are attached to or accompany the motor vehicle or item of motor vehicle equipment." However, the agency has discretion in terms of the information that must be provided in "printed matter" to the first purchaser of the vehicle, and recommend that NHTSA consider the development of new compliance options to permit digital format owners' manuals in lieu of hard copy (printed) owners' manuals.

The use of electronic means of storing and communicating vehicle owner's manual information can improve the quality, utility, and clarity of information, by providing features and functionality that allow consumers to access relevant information more easily. These technology solutions ensure robust alternatives are provided while not compromising consumer access to relevant and up-to-date vehicle information. The use of electronic means of communication can also be used to improve accessibility in terms of how information may be presented to consumers. For example, using intuitive user interfaces and enhanced search functionality.

In general, the overall cost and environmental impact of producing current vehicle owner's manuals can be significant. The use of technology alternatives also present significant opportunities for reducing overall printing costs and the use of paper-based materials associated with owner's manual production.

The use of digital technologies also has the potential to help minimize unintended costs associated with errors or corrections that may be required after the vehicle is sold to the consumer. For example, in cases where a recall notice may be issued to update or modify the owner's manual contents, it may be possible to update this information remotely, easing the burden currently placed on the consumer to keep track of the most current version.

With advances in new technology, Auto Innovators recommends that NHTSA conduct research in support of rulemaking to permit the use of electronic or digital owners' manuals as a compliance option for providing required information to consumers. Our members are committed to providing input in support of such an analysis and look forward to further engagement on this issue.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Schmidt". The signature is fluid and cursive, with a large, stylized "S" at the beginning and a long, sweeping underline.

Scott Schmidt
Vice President, Safety Policy
Alliance for Automotive Innovation