

Comment from Janet Liff

I am writing to support the comments of the League of American Bicyclists.

The current draft research test procedures do not adequately, objectively, and practically assess the system performance of the underlying ADAS because they fail to adequately address interactions with people outside of vehicles. The included scenarios related to bicyclist, pedestrian, and wheelchair user safety are incomplete and do not include scenarios that have been tested internationally for several years.

With recent years showing increases in bicyclist and pedestrian deaths it is disappointing to see the lack of attention paid to bicyclist and pedestrian safety in the draft test procedures. Specific gaps in the identified tests are addressed in the League's comments.