

# Comment from Gregory Shill

Posted by the **National Highway Traffic Safety Administration** on Feb 6, 2023

Dear Associate Administrator Chen:

The deadline indicated in this Request for Public Comment is 60 days. I respectfully request that this deadline be extended by 30 days to 90 days.

Recent DOT and NHTSA rulemakings on the topic of vehicle and roadway safety have allowed for 90-150 days of comments. Those decisions reflect both the importance of the subject matter and the number and diversity of stakeholders that are affected and need time to weigh in. One highly analogous example is NHTSA's own 2022 NCAP RFC (91 days) (<https://www.federalregister.gov/documents/2022/05/06/2022-09831/new-car-assessment-program-request-for-comments-extension-of-comment-period>). The FHWA's proposed MUTCD revision, launched in 2020, allowed 151 days (<https://www.federalregister.gov/documents/2021/02/02/2021-01440/national-standards-for-traffic-control-devices-the-manual-on-uniform-traffic-control-devices-for>). Collectively, these attracted tens of thousands of comments, suggesting the degree of public interest in these matters is high.

In the case of the instant RFC, concerning a revision to the Model Minimum Uniform Crash Criteria, the interests of over 50 state, district, and territorial DOTs, dozens of city DOTs, thousands of state, local, and federal police departments, and many more outside subject-matter experts, advocacy groups, and representatives—as well as millions of roadway crash victims and their families—are implicated. I would ask that they be given the same opportunity to comment that similarly situated stakeholders have on recent requests.

Sincerely,  
Gregory Shill

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(affiliations listed for identification purposes only and do not imply institutional approval)