

27 February 2023

U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Veoneer response to DOT NHTSA-2023-0002 Request for Comments

Veoneer HoldCo, LLC. is an automotive technology company, a world leader in active safety and restraint control systems, focused on delivering innovative, best-in-class products and solutions to our customers. Our purpose is to create trust in mobility. Veoneer is a Tier-1 hardware supplier and system integrator with products being part of more than 125 scheduled vehicle launches for 2022. Headquartered in Stockholm, Sweden, Veoneer has 6,100 employees in 11 countries. The Company is building on a heritage of close to 70 years of automotive safety development.

Veoneer is also the premier manufacturer of automotive thermal cameras (over a million on vehicles around the globe) designed to protect pedestrians, bicyclists and other Vulnerable Road Users (VRUs) in all- weather day and night conditions shown in the video at this link: <https://www.youtube.com/watch?v=eEQLEmOmGqY>

Veoneer is responding to the February 2, 2023 Request for public comment: Model Minimum Uniform Crash Criteria (MMUCC; 88 FR 7128; Docket DOT-NHTSA-2023-0002). This request relates to the standardization of MMUCC crash data that the National Highway Traffic Safety Administration (NHTSA) obtains from the States.

All vehicles have safety features to reduce crash probability and severity. These include occupant protection such as seatbelts and airbags to reduce crash severity, and sensors to reduce crash probability by alerting the driver of hazards or even to automatically attempt to avert crashes. As NHTSA wishes to understand how well such devices perform in reducing crash incidence and severity, we recommend that crash reports include what safety systems are installed in vehicles involved in a crash.

Until VINs identify safety features (e.g., back-up camera, forward collision warning, Lidar, radar, thermal night vision, etc.), we recommend the MMUCC list safety features a vehicle may contain so that crash reports can identify which are in each vehicle involved in a crash.

The MMUCC 6th edition includes the attribute 'safety systems' under data element V41: Contributing Circumstances, Motor Vehicle (page 137) defined as 'pre-existing motor vehicle defects or maintenance conditions that may have contributed to the occurrence or severity of the crash.' As the crash report is to identify one attribute among many, including 'safety systems,' as the principal failing attribute contributing to the crash, V41 does not address our recommendation.

We therefore recommend NHTSA consider adding a Vehicle data element to the 6th edition to identify safety devices installed in each vehicle involved in a crash. This might be entitled 'Vehicle Safety Devices' with an attribute list of safety devices the crash data collector can check for each vehicle involved in a crash, e.g.:

V45. Vehicle Safety Devices

Element Definition: This element identifies safety systems installed on this vehicle.

Attributes: Check all that apply

- Adaptive Cruise Control (ACC)
- Adaptive headlights – Legal since 2022
- Airbags
 - Front – mandatory since 1999
 - Rear
 - Side-curtain
- Antilock brake system (ABS) – mandatory since 2000
- Automatic Emergency Braking (AEB)
 - Front
 - Rear
- Automatic High Beams
- Backup camera – mandatory since 2018
- Blind-spot monitor (BSM)
- Brake assist
- Driver-attention monitor
- Electronic Stability Control (ESC) – mandatory since 2012
- Forward-collision warning (FCW)
- Head Restraints
 - Active
 - Passive
- Head-Up Display (HUD)
- Lane-Centering Assist (LCC)
- Lane Departure Warning (LDW)
- Lane-Keeping Assist (LKA)
- Lane-Tracing Assist (LTA)
- Lidar
- Lower Anchors and Tethers for Children (LATCH) – mandatory since 2002
- Pedestrian Detection
- Radar
- Rear Cross-Traffic Alert (RCTA)
- Semi-autonomous driving
- Telematics GPS tracking
- Thermal camera (Night-Vision)
- Three-point seatbelts – mandatory since 1968
- Tire Pressure Monitor – mandatory since 2007
- Traction Control – mandatory since 2011
- Traffic-Sign Recognition (TSR)

Thank you for considering Veoneer’s recommendation regarding the MMUCC 6th edition.