



June 5, 2023

**Safe Kids Worldwide and Safe Kids in Automated Vehicle Alliance  
Comment to the National Highway Traffic Safety Administration  
Federal Register Notice No. 88 FR 20608  
Response to NHTSA Request for Comment:  
Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative**

**RE: Docket No. NHTSA-2023-0015**

**Response to Request for Comment**

Safe Kids Worldwide (Safe Kids) and the Safe Kids in Autonomous Vehicles Alliance (SKAVA) appreciates the opportunity to comment on the extension of the National Highway Traffic Safety Administration (NHTSA) "Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative.

NHTSA's information and data collection under the AV TEST Initiative provides a mechanism to keep the public and safety advocates informed about automated vehicle (AV) testing activities to be conducted on public roads throughout the country. It also helps provide a more complete picture of the regulations and guidelines governing this testing at the state and local levels. Safe Kids and SKAVA continue to encourage collection of information from developers that includes reports of testing considering the needs of families transporting children of varying ages and developmental needs. We also encourage the collection from states and local authorities of information regarding regulatory developments in this space addressing the safety of children, in the hopes this will spur such legislators and regulators to address the topic.

The information being collected through AV TEST has been and will continue to be helpful for the public and remains consistent with the goals of both SKAVA and SKW. SKAVA was formed to develop guidance informing legislation, policy, enforcement, education, and best practices in this continually evolving field to ensure the safety of child passengers is seriously considered and valued in AV development.

**About Safe Kids Worldwide**

Safe Kids Worldwide is a grassroots non-profit dedicated to protecting kids from preventable injuries. We are a resource to help parents and caregivers keep kids safe from car crashes, fires, falls, poisoning and more. Through nearly 400 coalitions in the U.S. and partners in more than 30 countries, Safe Kids works with children's hospitals, trauma centers, first responders and public health experts to get evidence-informed, life-saving information to families, no matter where they live. Safe Kids engages in all pillars of improving public health and prevention which include research, education, awareness, and public policy advocacy.

**About Safe Kids in Autonomous Vehicles Alliance**

The Safe Kids in Automated Vehicles Alliance (SKAVA) is a stakeholder group including nationally recognized child safety advocates and transportation experts working to ensure that the safety needs of children are actively considered throughout the research, testing, and development of AVs. We are encouraged by the expansion of automated driving features and their potential to prevent or mitigate crashes. SKAVA's priority is to facilitate stakeholder discussion, collaboration, and action toward enhancing the safety of children as these technologies evolve, thereby reducing the risk of injury and death.