

**Subject: Response to Notice NHTSA-2023-015, Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval of Automated Vehicle Transparency and Engagement for Safe Testing (AV Test) Initiative**

General Comments:

- Regarding Automated Driving Systems (ADS) testing operation information, users often only share positive information to avoid damaging the reputation of the project Original Equipment Manufacturers (OEMs) and other partners in the market. There should be a mechanism to ensure the operational design domain and limits of the shared data will be provided, considering the project stakeholders' confidentiality concerns.
- Estimated Burden hours and annual labor costs, hours and rates look reasonable for the job assuming the average required hours, considering collection of the initial data will take more time and effort than providing regular updates.

Consider the following recommendations to improve the website's effectiveness and user experience:

1. **User Interface and Design:** Use of interactive maps and charts of different types would allow users to explore data more effectively and enable users to gain insights from the data. Consider changing the website address from Automated Vehicle to include ADS.
2. **Data Accuracy and Updates:** Regularly verify and update the data provided on the website to ensure its accuracy and relevance. Outdated or incorrect information could lead to misinterpretation or confusion.
3. **Privacy:** Communicate the privacy measures to protect the data shared by entities involved in ADS testing.
4. **Data Presentation:** Consider using graphs, charts, and infographics to present visually engaging data. This can make complex information more digestible and attractive to a broader audience.
5. **Mobile-Friendly:** Ensure the website is optimized for mobile devices to accommodate users accessing the platform from smartphones and tablets. Maps and charts are not visible on my smartphone in the current design.
6. **Accessibility:** Ensure the website meets accessibility standards, allowing people with disabilities to navigate and access information easily.
7. **Data Exporting:** Provide options for users to export data in various formats (e.g., CSV, Excel) for their own analysis or reporting purposes.
8. **Public Awareness:** Increase public awareness about the website's existence and benefits to encourage entities and local authorities that are involved in ADS testing to contribute and use the platform.
9. **Feedback Mechanism:** Implement a feedback mechanism to collect user feedback and suggestions for further improvements. This could help identify areas that need enhancements or additional features that users might find valuable.
10. **Translation:** Consider translating website content into different languages to reach a larger international audience.