



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

August 3, 2023

Docket Management Facility, M-30
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Room W12-140
Washington, DC 20590-0001

RE: Docket Number: NHTSA-2023-0023/FMCSA-2022-0171
Heavy Vehicle Automatic Emergency Braking; AEB Test Devices

The Commercial Vehicle Safety Alliance (CVSA), on behalf of the Commercial Vehicle Brake Manufacturers Council (CVBMC), respectfully requests a 30-day extension to the comment period for the joint notice of proposed rulemaking (NPRM) from the National Highway Traffic Safety Administration (NHTSA) and the Federal Motor Carrier Safety Administration (FMCSA) proposing to require automatic emergency braking (AEB) systems on heavy vehicles, Docket No. NHTSA-2023-0023/FMCSA-2022-0171.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to prevent commercial motor vehicle crashes, injuries and fatalities and believes that collaboration between government and industry improves road safety and saves lives. Our mission is to improve commercial motor vehicle safety and enforcement by providing guidance, education and advocacy for enforcement and industry across North America.

CVBMC is a council of original equipment manufacturer company representatives under CVSA. The primary objective of CVBMC is to provide expertise, leadership, data and direction regarding commercial motor vehicle brake systems and components. CVBMC is currently comprised of members from the following brake manufacturers: Bendix Commercial Vehicle Systems, Consolidated Metco, Fras-le, SAF Haldex Commercial Vehicle Systems, Hendrickson International, Meritor, Walther Engineering & Manufacturing Co., Webb Wheel Products, Inc. and ZF Group.

CVSA applauds the agencies for seeking public comment on this critical issue and we look forward to providing comments to the agency on behalf of CVSA and CVBMC. However, 60 days is not adequate time to prepare and approve comments on such a complicated and important issue. CVSA and CVBMC are working to develop comments in response to the proposal and would like the opportunity to collaborate with other entities that will

be commenting, to ensure all issues and concerns are addressed and our organization can provide NHTSA and FMCSA with comments that will contribute to a comprehensive, well informed, science and data-based NPRM.

To that end, CVSA and CVBMC are working with our colleagues in the commercial motor vehicle industry to facilitate an industry discussion on the proposal in late August, in order to accommodate the current September 5 comment deadline. Stakeholders and subject matter experts, including brake manufactures, motor carriers, and commercial motor vehicle manufacturers, will be invited to share their thoughts on the proposal, ask questions of one another and have an open dialogue on the requirements being proposed by NHTSA and FMCSA. We invite representatives from NHTSA and FMCSA to attend the meeting, as it will be an excellent opportunity for your agencies to listen to the concerns and thoughts of industry and engage in information gathering. Granting a 30-day extension to the comment period would allow for greater stakeholder discussion and engagement, which will result in better, more comprehensive feedback to the NPRM.

In addition, CVSA and CVBMC encourage the agencies to consider holding a DOT-led stakeholder listening session, if possible, to allow industry an additional opportunity to provide direct feedback to the agencies, similar to the listening sessions FMCSA held related to electronic logging devices and the industry forum NHTSA held while developing the antilock brake system (ABS) requirements.

CVSA works to closely monitor, evaluate, and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the opportunity to comment on this proposal and the agencies' commitment to safety and stakeholder involvement.

If you have further questions or comments, please do not hesitate to contact me at 202-998-1008 or collin.mooney@cvsa.org.

Respectfully,

A handwritten signature in black ink, appearing to read 'Collin B. Mooney'.

Collin B. Mooney, MPA, CAE
Executive Director
Commercial Vehicle Safety Alliance