



**National Highway Traffic Safety Administration  
Docket # NHTSA-2023-0023 / FMCSA-2022-0171**

**Heavy Vehicle Automatic Emergency Braking**

**November 13, 2023**

The Automobile Carriers Conference (ACC) of the American Trucking Associations and the Auto Haulers Association of America (AHAA) submit the following comments to the proposed Automatic Emergency Braking (AEB) rulemaking. We acknowledge these comments are being filed after the deadline, but we appreciate your consideration of potential issues unique to automobile transporters.

The motor carriers represented by ACC and AHAA represent a significant portion of the automobile transporter industry, most of which use stinger-steered automobile transporters to haul finished vehicles from a manufacturing facility, railroad terminal, or staging lot to automobile dealers. While these comments are focused on stinger-steered automobile transporters, the same logic would apply to other configurations with a headramp, including a traditional automobile transporter.



Figure 1. Stinger-Steered Automobile Transporter

Many of our members already use driver-assist technologies that include an AEB feature. However, the path to adoption for automobile transporters is difficult, especially for those technologies and/or manufacturers that use sensors in the windshield. In short, the tractor on a stinger-steered automobile transporter is usually modified after it comes off the assembly line, which includes lowering the roof – in effect, reducing the windshield height – to comply with

vehicle height restrictions, and there are several vertical and horizontal support beams that might interfere with windshield camera field of view.

To be candid, the AEB rulemaking is complex, and we simply do not know what impact, if any, it will have on our segment of the industry. Our general concern is that the agency might require something that is not compatible with stinger-steered automobile transporters and other vehicle configurations that use a headramp, even among carriers that already use an AEB solution. As a result, we believe NHTSA and FMCSA should establish a process to consider exceptions specific to the AEB rulemaking in situations where vehicle configuration interferes with operation.

Thank you for your time and consideration of our comments. Please contact us directly with any questions.

Sincerely,

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