

Comment from Michael Allen

Posted by the **National Highway Traffic Safety Administration** on Mar 8, 2024

Overall I support the movement of the proposed amendments to the Federal Motor Vehicle Safety Standard regarding minimum sound requirements for hybrid and electric vehicles (HEVs). The NPRM represents a crucial step forward in enhancing pedestrian safety, promoting consumer choice and customization, and fostering innovation within the automotive industry. Further analysis of the document shows that the introduction of selectable pedestrian alert sounds addresses a significant safety concern associated with the quiet operation of HEVs. Studies have shown that electric vehicles are more likely to be involved in pedestrian and bicycle collisions due to their silent operation. By allowing drivers to choose from a variety of alert sounds, pedestrians and other road users will be better able to detect the presence of HEVs, thereby reducing the risk of accidents and enhancing overall road safety. Additionally, the proposed amendment promotes consumer choice and customization, which are fundamental aspects of the American automotive culture. Allowing drivers to personalize their vehicles with unique alert sounds not only enhances the driving experience but also empowers consumers to express their individuality. This increased flexibility in vehicle design will undoubtedly lead to greater customer satisfaction and loyalty. However, despite all the benefits, there is an argument that allowing automobile manufacturers the ability to add these extra features will increase the cost of manufacturing and therefore drive up prices. In reality, this is not the case, and it is quite the opposite. According to Reuters, “NHTSA projected the alerts would prevent 2,400 injuries annually by 2020 and cost the auto industry about \$40 million annually because automakers needed to add an external waterproof speaker to comply. The benefits of reduced injuries are estimated at \$250 million to \$320 million annually” (Shepardson 2022). Although there may be initial costs associated with adding safety features, the long-term benefits, both in terms of human lives saved and financial savings, justify the investment. Despite all the benefits of this NPRM, there are still modifications that should take place to create the perfect end product. The selectable sounds should not add new distractions for drivers or pedestrians. To mitigate these risks, the NPRM could include provisions that establish guidelines for the design and implementation of alert sounds, ensuring that they are consistent, appropriate, and easily recognizable. Testing the selectable sounds through different environmental conditions such as urban and rural settings will be important to avoid any further distraction or confusion. By incorporating these modifications into the NPRM, the proposed amendments can achieve their intended objectives of enhancing pedestrian safety and promoting consumer choice and customization.

References:

Shepardson, D. (2022, July 12). U.S. auto agency will not allow EV owners to pick alert sounds. Reuters. Retrieved March 7, 2024, from <https://www.reuters.com/business/autos-transportation/us-auto-agency-will-not-allow-ev-owners-pick-alert-sounds-2022-07-12/>