



May 15, 2024

Sophie Shulman  
Acting Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

**RE: Federal Motor Vehicle Safety Standards; Fuel System Integrity of Hydrogen Vehicles; Compressed Hydrogen Storage System Integrity; Incorporation by Reference [NHTSA-2024-0006]**

Dear Ms. Shulman,

The Alliance for Automotive Innovation (“Auto Innovators”) respectfully requests a 30-day extension of the deadline for providing public comments in response to the recently issued Notice of Proposed Rulemaking (NPRM), which seeks to establish two new Federal Motor Vehicle Safety Standards (FMVSS) that specify requirements for the integrity of the fuel system in hydrogen vehicles during normal operation and after crashes.<sup>1</sup> The 60 page proposed rule appeared in the Federal Register on April 17, 2024 with a published comment deadline of June 17, 2024.

Despite limited deployment of hydrogen vehicles to date, this rulemaking has significant implications for future vehicle design and performance, and it is important that there is an opportunity to carefully evaluate key aspects of the proposal. The additional time is necessary to enable our member organizations to conduct a detailed review of the NPRM and provide constructive feedback on the agency’s proposal. While we understand the rationale behind combining both the FMVSS 307 and FMVSS 308 performance requirements into a single notice, it adds to the volume of data and complexity in evaluating the proposed use cases that the technology would need to address. More specifically, we have identified almost one hundred instances where the agency specifically seeks public comment on its proposed rulemaking. Several of these issues are highly complex and require careful consideration, particularly where there are differences in the agency’s approach when compared to Global Technical Regulation (GTR) No. 13 (“Hydrogen and Fuel Cell Vehicles”).

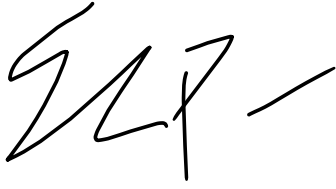
As a result, Auto Innovators request a reasonable 30-day extension of the current deadline in order to provide more detailed comments to inform the rulemaking process. This would make the comments due no later than July 17, 2024.

We look forward to any follow-up with the agency to discuss this request further.

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<sup>1</sup> FMVSS No. 307, “Fuel system integrity of hydrogen vehicles” and FMVSS No. 308, “Compressed hydrogen storage system integrity,”

Sincerely,

A handwritten signature in black ink, appearing to be 'SP' followed by a horizontal line.

Sarah Puro  
Vice President, Safety and Technology Policy  
Alliance for Automotive Innovation

Cc: Mr. Ryan Posten