

Comment from OP Mobility

Posted by the **National Highway Traffic Safety Administration** on May 24, 2024

OP mobility has historically been a plastic fuel system supplier operating under the provisions of FMVSS 301 for many years and is now manufacturing hydrogen storage vessels and systems for applications globally. We have recently been reviewing your proposals for FVMSS 307/308 and must admit that we truly need more time to make a proper analysis in order to ensure 2 main points.

- 1.The standard ensure the utmost of system safety
- 2.The standard aligns with global norms as we have many customers asking for global vehicle platforms here in the early stages of the H2 economy to have scale
- 3.The standard takes into account a certain element of validation efficiency so as to avoid development cycles that are prohibitively long or costly, ultimately slowing innovation loops and vehicle proliferation.

At first glance the specification is not too far but our team is working hard to really dig into the details, as minor changes could have major effects.

We ask that you extent the period of comment for an additional 30 days to be able to better respond to your proposal.

As a gesture of good faith we are working with others in the industry to harmonize the comments and ensure that you are not having to sift through many of the same comments over and over.