



June 14, 2024

National Highway Traffic Safety Administration
Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001

Submitted electronically via www.regulations.gov

RE: Docket No. NHTSA-2024-0012; FMVSS No. 305a Electric- Powered Vehicles: Electric Powertrain Integrity Global Technical Regulation No. 20, Incorporation by Reference.

Thank you for the opportunity to comment on the notice of proposed rulemaking (NPRM) to establish FMVSS No. 305a, Electric-powered Vehicles: Electric Powertrain Integrity to upgrade and replace the existing FMVSS 305, Electric-Powered Vehicles: Electrolyte Spillage and Electrical Shock Protection. The Center for Auto Safety (CAS), founded in 1970, is an independent, member supported, non-profit consumer advocacy organization dedicated to improving vehicle safety, quality, and fuel economy for all drivers, passengers, and pedestrians.

CAS strongly supports the National Highway Traffic Safety Administration's (NHTSA) efforts to improve safety standards for Rechargeable Electrical Energy Storage Systems (REESS), and the incorporation of Global Technical Regulation No. 20 into US standards.

While largely concurring with the NPRM, CAS feels that this proposed rulemaking is a missed opportunity to establish and require distinctive marking applied to REESS-equipped vehicles to identify REESS-associated electrical shock hazards, electrical isolation points and mechanisms, and related design features by means of standardized, permanently affixed labels. Prominent permanently-affixed labels identifying critical safety-related design features, hazards, and mechanisms would benefit both consumers and officials. Emergency personnel, consumers, and

maintenance technicians including mechanics could rely on those labels to immediately identify and act in accordance with these critical protective features without necessarily resorting to reference materials, especially important in emergency situations where resorting to internet access to NHTSA-stored archives causes an unacceptable delay in emergency response or rescue.

The proposed reliance on remote archived material could significantly delay rescue in emergencies where internet access is not available, risking inadvertent injuries or electrocutions. Hazard labeling is commonplace in comparable aviation and industrial equipment applications and is not a substantial financial burden to manufacturers.

Expanded emergency response information included in the emergency response guides (ERG) required by the proposed rule is a feature of the NPRM that we strongly support, but safe emergency response and rescue should be expedited by readily identifiable permanently affixed labels and should not be hamstrung by limited or unavailable internet access. CAS seen no reason why proven, inexpensive and life-saving labelling measures could not be mandated and were not included in the NPRM for REESS-equipped vehicles.

Conclusion

Thank you for the opportunity for CAS to provide comments on the proposed rulemaking FMVSS No. 305a Electric- Powered Vehicles: Electric Powertrain Integrity. CAS believes that it is a timely and important addition to the FMVSS to ensure electric vehicle safety as electric powertrains become more commonplace. CAS urges NHTSA to establish and mandate safety labelling for REESS safety-related design features and rescue/recovery electrical isolation/protection needed by first responders and consumers alike.

Sincerely,

A handwritten signature in black ink, appearing to read 'm/brooks', written in a cursive style.

Michael Brooks
Executive Director