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The Honorable Sophie Shulman
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Comment on Notice of Proposed Rulemaking (NPRM) - FMVSS No. 305a Electric-Powered Vehicles (RIN 2127-AM43) Published in the Federal Register on April 15, 2024

Dear Deputy Administrator Shulman:

Navistar Inc. (Navistar) appreciates the opportunity to provide comments on the proposed NHTSA regulation to establish Federal Motor Vehicle Safety Standard (FMVSS) No. 305a, Electric-Powered Vehicles: Electric Powertrain Integrity¹.

Based in Lisle, Illinois, Navistar and its subsidiaries and affiliates produce International® brand commercial trucks and engines, IC Bus® brand school and commercial buses, all-makes of OnCommand® Connection advanced connectivity services, and Fleetrite®, ReNEWeD® and Diamond Advantage® brand aftermarket parts. With a history of innovation dating back to 1831, Navistar has more than 14,500 employees worldwide and is part of TRATON SE, a global champion of the truck and transport services industry. Navistar vehicles account for nearly 15% of the total Class 8 fleet, 20% of the Class 6-7 fleet, and approximately 40% of school buses on roads in the United States today.

Navistar is a member of the Truck and Engine Manufacturers Association (EMA) and supports the comments submitted on behalf of EMA and its members. Navistar supports NHTSA's objectives to harmonize FMVSS 305a with GTR 20 and efforts to improve the safety of electric-powered heavy vehicles, including school buses. Navistar submits herein additional comments related specifically to the heavy school bus crash tests proposed in the NPRM.

NHTSA proposes in the NPRM to assess the post-crash safety of heavy school buses (with a GVWR greater than 10,000 lbs.) through a dynamic moving contoured barrier test, consistent with the test currently included in FMVSS 301². As stated in the NPRM, there are currently no crash tests requirements for heavy duty vehicles, other than those for heavy duty school buses, contained in the

¹ 89 Fed. Reg. 26,704 (April 15, 2024)

² 89 Fed. Reg. 26,708.

FMVSS³. As noted, this is due in part to the fact that heavy vehicles are typically low-volume made-to-order with a wide variety of different configurations⁴.

Navistar supports the heavy school bus crash test proposed in the NPRM as it is a well-established requirement based on FMVSS 301 Fuel System Integrity developed for liquid-fueled heavy school buses. Heavy school buses carry a significant number of children; it is critically important that electric-powered heavy school buses provide the same level of crashworthiness and protection as liquid-fueled heavy school buses. Battery electric heavy school buses are currently being manufactured and deployed across the country, and the number of electric powered school buses is only expected to increase in the coming years.

Navistar believes that full-scale crash testing of electric heavy duty school buses is feasible and reasonable since heavy duty school buses come in relatively few vehicle models and vehicle configurations. For heavy vehicles other than school buses, Navistar agrees with NHTSA and EMA that there could also be practicability constraints for conducting crash tests on higher weight classes of heavy vehicles and developing proper component-level tests is more appropriate to evaluate the crashworthiness than full-scale vehicle crash tests. Finally, Navistar agrees with NHTSA that the proposed standard would not have a substantial effect on heavy school bus cost and weight⁵.

Thank you for your consideration of these comments as well as the detailed comments submitted by EMA. Navistar looks forward to engaging in the next steps of this critical rulemaking and will continue to support USDOT's efforts to improve road safety however possible.

Sincerely,

Richard Kempf
Vehicle Regulatory Compliance
Navistar, Inc.



³ 89 Fed. Reg. 26,709.

⁴ Id.

⁵ Id.