



April 19, 2022

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

RE: New Car Assessment Program [Docket No. NHTSA-2021-0002]

The American Association of Motor Vehicle Administrators (AAMVA) thanks the National Highway Traffic Safety Administration (NHTSA) for its request for comments on its New Car Assessment Program (NCAP). The NCAP and its evaluation of capabilities and technology provides valuable insight to consumers making an informed purchase decision about their vehicle and educates them about the safety features of the vehicle.

AAMVA supports NHTSA's inclusion of the four additional ADAS technologies – blind spot detection, blind spot intervention, lane keeping support and pedestrian automatic emergency braking into those currently recommended by NHTSA. As these features become the norm, they carry the potential to assist and encourage the safest possible driving environment. The four identified ADAS systems represent common driver behavior flaws, and could add an additional layer of protection for all road users.

As the technology being integrated into vehicles becomes more complex and the performance of the vehicle becomes more dependent on the incorporation of specific safety features, a clear perspective of the capabilities of the vehicle becomes more important for a prospective operator that may be unfamiliar with specific vehicle safety systems being offered on a particular vehicle. AAMVA supports NHTSA's recommendations and enhanced evaluation of specific advanced driver assistance systems (ADAS) technologies. Because proprietary safety features of a vehicle may be called something slightly different between vehicle models, the ability to evaluate the performance of these technologies, harmonize them across brands and consumer information programs, and make that information readily available to consumers would benefit product transparency and promote consumer education about vehicle function and capabilities.

AAMVA also supports NHTSA's determination to increase stringency to the test procedures and performance criteria for forward collision warning, lane departure warning, crash imminent braking and dynamic brake support to enable enhanced evaluation of their capabilities in current vehicle models, reduce test burden and harmonize those products with other consumer information programs. Consumer education on capabilities, differences in capabilities, and harmonization of effectiveness of ADAS technologies will enhance consumers ability to understand the limits of those technologies and provide greater transparency into how these technologies enhance current driver behaviors without interfering with the integral human element involved in safe driving behavior.

While AAMVA defers expertise on the best method for easily understood rating systems for vehicles equipped with these technologies, we do support a universal rating method subject to stringent testing requirements. A highly visible, universally applied rating system would level the playing field for consumers who already rely on the presence of ADAS technologies in their vehicles to assist with the dynamic driving task, and further provide consumers with insight into how ADAS performance may impact the overall vehicle safety features of their individual vehicle. In line with this, AAMVA also supports the provision of a crash avoidance rating on the vehicle at the point of sale, consistent with the 2015 Fixing America's Surface Transportation Act. As these vehicle features are

updated, or their performance metrics change, it will be important that the information accompanying a vehicle at the point of sale are also updated to reflect the most recently applicable information regarding crash avoidance safety features.

Utilization of the New Car Assessment Program to convey consumer awareness of certain safety technologies to make safe driving choices is an important step forward into visibility of the technologies and increasing understanding of how (and when) a human driver may be able to increase safety assistance from advanced driver assistance technologies. AAMVA supports NHTSA in these important efforts and looks forward to increased development of the New Car Assessment Program in the years to come.

Cian Cashin

AAMVA Director of Government Affairs

ccashin@aamva.org