Statement of the
Motor & Equipment Manufacturers Association (MEMA)

Before the
National Highway Traffic Safety Administration
of the
U.S. Department of Transportation

Public Hearing on New Car Assessment Program
Docket No. NHTSA-2018-0055

October 1, 2018 – Washington, DC

Good afternoon. My name is Leigh Merino. I am the senior director of regulatory affairs for the Motor & Equipment Manufacturers Association (MEMA), which represents vehicle suppliers that manufacture original equipment and aftermarket components and systems used in light and heavy vehicles.[i] Vehicle suppliers are leaders in developing advanced, transformative technologies that enable safer, smarter and more efficient vehicles, including a wide variety of safety systems used to enhance crashworthiness and to mitigate and avoid collisions with other vehicles and road users.

MEMA appreciates the opportunity to be here today to talk about the National Highway Traffic Safety Administration's request for comments to help guide the agency in planning its next steps about the U.S. New Car Assessment Program (NCAP). MEMA will submit written comments responding to the agency's *Federal Register* notice and will address the sections dealing with crash avoidance, ratings, and consumer information. For the purposes of today's hearing, I will present a few key principles about NCAP and crash avoidance that are important to suppliers.

MEMA has long supported updates to the U.S. NCAP to include safety system technologies and is glad that NHTSA is revisiting the future of the U.S. NCAP, which has been in limbo for some years now. For the past several years, MEMA has urged both NHTSA and Members of Congress to support solutions to update the NCAP, specifically to include crash avoidance and mitigation technologies, as well as to improve consumer information and education.

As key innovators of advanced vehicle technologies, suppliers are on the forefront of evolving and engineering the sensors, components and systems vital to enhancing crash avoidance and mitigation systems as well as pedestrian detection and avoidance systems. These technologies are available today, but deployment is still low. This is why consumer education and understanding are critical and where NCAP can play a key role. Further, although suppliers are working very closely with their vehicle manufacturer customers to bring automated driving systems (ADS) to the market, these ADSs will not be broadly

available for many years. More attention and focus must be directed to increasing the presence of crash avoidance systems in the US vehicle fleet so as to address the rising numbers of deaths and injuries.

First, MEMA believes that NHTSA should develop a comprehensive plan to upgrade NCAP in phases. This plan should present a clear roadmap for manufacturers that has practical implementation timeframes and includes technologies that address common crash scenarios that yield the largest safety benefits. This roadmap must include realistic milestones with associated deliverables. The last substantive update to the NCAP was in 2011. Since then safety technologies have rapidly evolved and opportunities to update the program were stalled. Certainly, MEMA recognizes the complexity of updating the current U.S. NCAP to catch up with the host of advanced safety systems that are increasingly being made available on more and more vehicles – whether as standard or optional equipment. MEMA would also urge NHTSA to set a regular schedule of technology meetings with suppliers to assess whether changes to the roadmap would be needed.

Second, MEMA urges NHTSA to act and fulfill its congressional mandate under the FAST Act of 2015 that requires crash avoidance information to be presented next to crashworthiness information on the Monroney label questions. Consumer education by providing the consumer with complete government safety information about a vehicle, is an important component of NHTSA's mission. Presenting information about the crash avoidance technologies available on a vehicle's Monroney label promotes consumer awareness about the availability of enhanced vehicle safety systems, increases consumer knowledge and demand, and accelerates the integration of these safety systems into the market. MEMA's written comments will discuss the types of safety technologies we believe should be included as part of updating the Monroney label.

Additionally, MEMA also urges NHTSA to consider revisiting the subject of the size of the safety portion of the Monroney Label. We believe there is an opportunity to increase the size of this facet on the overall label and, as a result, provide more information to consumers. Part of the struggle in past years has been the issue of how to fit information about advanced systems into the small area of the label's "real estate" currently devoted to safety. Since NHTSA seeks to undertake a comprehensive review of how the US NCAP program can evolve and meet the needs of the future, MEMA would urge that the agency look beyond the traditional layout of the label as part of this process. Essentially, merely listing these kinds of systems on the SaferCar.Gov website or on a federal pamphlet is simply not sufficient. Three years ago, Congress required NHTSA to update the Monroney label with important crash avoidance information and it is time for the agency to commence the process to do just that.

Third, the U.S. NCAP should aim to align as much as possible with existing programs. Alignment of test protocols and test equipment with other global regional NCAP programs, such as EuroNCAP, is critical because it reduces or eliminates unnecessary burdens and duplicative resources not only for industry, but also for governments and third-party testing labs. Standardizing these procedures and equipment gives all stakeholders a

common, consistent objective that allows for improved certainty that benefits future product research, development and planning. Moreover, when these processes can be streamlined, it further enhances industry innovation and speeds technology advancement. Updating the NCAP to include active crash avoidance technologies and incentivizing vehicle manufacturers to include them on vehicles will undoubtedly reduce fatalities, injuries and property damage claims over time. In addition, it has become standard practice to provide one overall vehicle safety rating as part of these different NCAP programs across the world and MEMA would request that NHTSA adopt a similar approach. Our written comments will provide more detail on this position, but we believe it is a critical point relative to consumer acceptance and understanding.

In summary, MEMA recognizes that – yes – there are market challenges; advanced safety features typically have a slow adoption curve due to lack of consumer understanding and acceptance as well as to their reluctance to pay a premium. Computing power and sensor capabilities have rapidly improved with each new generation of these systems making them more widely available and under a range of price-points. As the rapid pace of technology and market penetration continues, this trajectory will only continue. Advanced safety technologies, if widely adopted, have the potential drastically reduce fatalities, injuries and property damage claims. Moreover, these systems are often the foundational components and systems upon which the more complex automated driving systems are built. Therefore, NHTSA developing a public roadmap is critical. Certainly, such an endeavor cannot solely rest on the shoulders of NHTSA. We believe that collaborations between the government, vehicle manufacturers (OEMs), suppliers, safety advocates, and other stakeholders are key to the success of any major evolution of the Program.

The time to acclimate the consumer and increase exposure to these safety systems is now. Updating the NCAP in practical, feasible phases, will provide the consumer with important information so that they can fully assess the "above and beyond" vehicle safety features available. If NHTSA continues to delay developing and implementing a measured, phased plan that substantively updates the U.S. NCAP, then the agency may miss the opportunity to update the NCAP in a meaningful way.

MEMA appreciates the opportunity to highlight some of our key issues. We will address in more detail in our written comments to the docket. Thank you for your time and consideration.

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[i] MEMA represents vehicle suppliers through the following four divisions: Automotive Aftermarket Suppliers Association (AASA), Heavy Duty Manufacturers Association (HDMA), Motor & Equipment Remanufacturers Association (MERA) and Original Equipment Suppliers Association (OESA). Suppliers are the largest employers of manufacturing jobs in the U.S. directly employing over 871,000 Americans with a total employment impact of 4.2 million jobs.