



January 18, 2022

***Electronic Submission***

Juliette Marie Vallese  
Associate Administrator  
Office of Communications and Consumer Information  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Ave., SE  
Washington, DC 20590

**RE: Agency Information Collection Activities; Notice of Request for Comment;  
Government 5-Star Safety Ratings Label Consumer Research  
[Docket No. NHTSA-2021-0033]**

Dear Ms. Vallese:

The Motor & Equipment Manufacturers Association (MEMA)<sup>1</sup> submits these comments to the National Highway Traffic Safety Administration (NHTSA) on its request for comments seeking a new collection of information on the Government 5-Star Safety Ratings Label Consumer Research, per the November 19, 2021, *Federal Register* notice.<sup>2</sup>

Vehicle suppliers are innovators and manufacturers of a multitude of technologies and a wide range of components, systems, and materials that improve vehicle safety, emissions, and efficiency. MEMA advocated for the mandate in the FAST Act to ensure crash-avoidance technology information is provided next to crashworthiness information on vehicle Monroney Labels.<sup>3</sup> More recently, MEMA supported the required enhancements to the U.S. New Car Assessment Program (NCAP) included in the Infrastructure Investment and Jobs Act.<sup>4</sup> Moreover, MEMA has a long history urging NHTSA to enhance and improve the overall NCAP to update and upgrade the colloquial “stars on cars” program. Similarly, as evidenced by over a decade of public comment dockets, NHTSA has a long history of evaluating how it can enhance and upgrade the NCAP as well as researching how consumers would comprehend, understand, and receive the information conveyed on the Monroney label.

NHTSA’s current request for public comments is about its intention to seek a new information collection from the Office of Management and Budget (OMB) to open another consumer research project. MEMA is pleased that NHTSA is taking the step to analyze updates to the Monroney label –

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<sup>1</sup> MEMA represents over 900 member companies through its four divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); MERA - The Association for Sustainable Manufacturing; and Original Equipment Suppliers Association (OESA). MEMA represents vehicle parts manufacturers that develop innovative technologies and manufacture original equipment (OE) and aftermarket components and systems for use in passenger cars and commercial trucks. Vehicle suppliers represent the largest sector of manufacturing jobs in the United States. [U.S. Labor and Economic Impact of Vehicle Supplier Industry](#), MEMA and IHS Markit. February 2021.

<sup>2</sup> 86 Fed Reg at 64989.

<sup>3</sup> Sec. 24322 of Part II – Safety Through Informed Consumers Act of 2015; Public Law 114-94.

<sup>4</sup> Sec. 24213 of Title IV – Public Law 117-58.



an action MEMA urged in our comments about NCAP over the years, most recently in 2018.<sup>5</sup> We were further encouraged by the agency's assurance in this notice, that it "intends to seek public comment on its proposal later in 2021."<sup>6</sup> Certainly, MEMA recognizes the challenges expressed by the agency about evaluating and developing a new rating system visualization on the label in a way that is flexible and practical to accommodate future updates of the NCAP. In the notice, NHTSA characterized they are working on "separate tracks ... to upgrade NCAP."<sup>7</sup> However, to date, NHTSA has not published any additional notices and requests for comments regarding planned revisions and upgrades to the NCAP to include crash avoidance technologies. MEMA is eager for both efforts – the consumer research on labels and the proposed NCAP upgrades – to be as parallel in timing as possible and not sequential. Aligning these efforts could potentially avoid any inadvertent delays impacting the progress of the agency's respective tracks to prepare for updating the 5-Star Ratings program. Unfortunately, the industry has now witnessed several cycles in which research has been funded and carried out but without any actual tangible upgrade to the NCAP and, therefore, no improvement to the safety information conveyed to consumers. Consequently, MEMA believes that it is critical to stress the need for demonstrable progress to be made within the next few months.

Considering NHTSA's intention to evaluate how consumers would respond to ways vehicle safety technology information is posted on the Monroney label, MEMA presents the following comments for the agency's consideration as it develops its research project.

- **Utilize Common, Consumer-Friendly Technology Nomenclature** – In 2020, SAE International, National Safety Council, AAA, Consumer Reports, and J.D. Power agreed to a common nomenclature for advanced driver assistance technologies (ADAS) "to aid in reducing driver confusion and define the functions of ADAS in a consistent manner."<sup>8</sup> MEMA suggests that this consumer-facing document is an important baseline for terms used in any consumer research relating to these systems. The more consumers are exposed to common, easy-to-understand terms, the more likely they are to be more confident in making choices to purchase vehicles with ADAS features.
- **Maintain Use of Stars in Ratings** – MEMA reiterates our support that the labels continue using the well-known, consumer-friendly "5-Star Rating" system. This format is already widely recognized by consumers. The stars are the most direct, tangible way by which the consumer can quickly understand the ratings information and make an informed, educated purchasing decision when comparing vehicles. Moreover, the star ratings are universally used by other global NCAP programs. MEMA further adds and reinforces our previous recommendations that, when NHTSA does move forward to update the NCAP, MEMA supports having separate scores for crash avoidance and crashworthiness categories.<sup>9</sup> These separate ratings should be included in the label.
- **Leverage QR Codes to Convey More Safety Information** – The Monroney Label is used to impart a lot of vehicle information, where only a small amount of space is allocated for the

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<sup>5</sup> NHTSA-2018-0055-0052, October 31, 2018.

<sup>6</sup> 86 Fed Reg at 64992.

<sup>7</sup> *Ibid.*

<sup>8</sup> "[CLEARING THE CONFUSION: Recommended Common Naming for Advanced Driver Assistance Technologies](#)" SAE International, J.D. Power, Consumer Reports, AAA and the National Safety Council, May 2020.

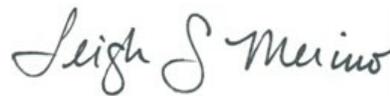
<sup>9</sup> NHTSA-2018-0055-0052 at page 5, October 31, 2018.

government's NCAP 5-star safety ratings. In addition, these labels are currently required to also show the government fuel economy ratings, the manufacturer's suggested retail price, engine and transmission specifications, standard equipment and warranties, and optional features and pricing. Unfortunately, the NCAP's star ratings section inhabits only the minimum size, as set under the original Congressional mandate,<sup>10</sup> relative to the overall Monroney Label. MEMA has previously recommended that NHTSA evaluate, in its research, how consumers would react to using QR codes as a method to convey supplemental information that may not physically fit on a label. A consumer scanning the code could take them to a mobile-friendly interface that shows all the pertinent test ratings and technology information for that vehicle. Since the QR code feature is used for government fuel economy information, it could be adopted and implemented by NHTSA.

Consumer understanding, trust, and acceptance of vehicle safety technologies are critical to deployment of ADAS technologies, which are the foundational building blocks for automated driving systems. If more widely adopted, these advanced safety technologies have the potential to drastically reduce fatalities, injuries, and property damage claims. It is vital that consumers can quickly comprehend the "above and beyond" vehicle safety features and NCAP ratings information conveyed on the Monroney Label. MEMA supports NHTSA's endeavor to continue its consumer research and eagerly await the agency's promise of its forthcoming proposal to upgrade and update the NCAP.

MEMA appreciates NHTSA's consideration of our comments as it prepares its consumer research evaluation. For more information or questions, please contact me at [lmerino@mema.org](mailto:lmerino@mema.org) or (202) 312-9249.

Sincerely,



Leigh S. Merino

Vice President, Regulatory Affairs

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<sup>10</sup> 15 U.S. Code, Title 15, Chapter 28.