



December 17, 2021

**VIA ELECTRONIC FILING**

Christopher Coes  
Principal Deputy Assistant Secretary for Transportation Policy  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590-0001

**RE: Notice and Request for Public Comments; U.S. DOT Strategic Plan  
[Docket No. DOT-OST-2021-0140]**

Dear Mr. Coes:

The Motor & Equipment Manufacturers Association (MEMA) respectfully submits the following comments to the U.S. Department of Transportation (DOT) in response to its request for comment on the draft Strategic Framework.<sup>1,2</sup> As the notice indicates, DOT is seeking stakeholder feedback to inform the development of the goals and objectives and update its Strategic Plan for Fiscal Years 2022-2026. As only the draft, high-level Strategic Framework was made available for comment, MEMA encourages DOT to solicit additional stakeholder feedback once DOT has developed a draft Strategic Plan before final publication.

**Introduction**

MEMA is the leading national trade association representing motor vehicle parts manufacturers, also known as vehicle suppliers. MEMA represents over 900 companies that develop innovative technologies and manufacture original equipment (OE) and aftermarket components and systems for passenger cars and commercial trucks.<sup>3</sup> Vehicle suppliers operate in all 50 states, directly employ over 907,000 Americans, and represent the largest sector of manufacturing jobs in the United States. Direct, indirect, and induced vehicle supplier employment accounts for over 4.8 million U.S. jobs and contributes 2.5 percent to U.S. GDP.

Across the entire range of new vehicle innovation – from automated driving systems to zero emission technologies – vehicle suppliers are leading the way. Vehicle suppliers conceive, design, and manufacture the OE components, systems, and technologies that make up more than 77 percent of the value in new vehicles. A typical vehicle can include 30,000 components and subsystems, the majority of which are developed through vehicle part manufacturers. Additionally, vehicle suppliers manufacture and remanufacture a multitude of aftermarket parts and materials for vehicle service, maintenance, and repair. Overall, vehicle supplier innovation provides a multitude of technologies and a wide range of products to improve vehicle safety, emissions, and efficiency. This technology development allows the U.S. vehicle industry to be globally competitive.

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<sup>1</sup> 86 Fed. Reg. at 68720.

<sup>2</sup> "DOT Strategic Framework FY 2022-2026," <https://www.transportation.gov/administrations/office-policy/fy2022-2026-strategic-framework>

<sup>3</sup> MEMA represents its 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).



Vehicle suppliers continue to invest billions of dollars leading the industry's research, development, and deployment of critical advanced technologies needed to improve vehicle safety and efficiency and to decrease vehicle emissions. MEMA's comments will focus on the DOT's Framework categories of "Safety" and "Climate and Sustainability."

### **DOT Strategic Framework – "Safety"**

MEMA shares and supports the DOT's goal to make the transportation system safer for all people and to work toward eliminating transportation-related fatalities and injuries. Vehicle suppliers are continuously innovating, enhancing, and evolving an array of advanced safety technologies that are designed to prevent or mitigate vehicle crashes, to protect vehicle occupants and non-occupants (i.e., vulnerable road users), and to provide enhanced mobility for all citizens. These technologies include a suite of advanced driver assistance systems (ADAS), automated driving systems (ADS) for automated vehicles (AVs), connected vehicle-to-everything (V2X) technologies, and integrated active/passive safety systems and components. Furthermore, vehicle suppliers produce a multitude of aftermarket parts, tools, materials, and technologies for the service, maintenance, and repair of over 286 million vehicles on U.S. roadways.<sup>4</sup> Regular maintenance, service, and repair made possible by a robust aftermarket are critical to keep consumer and fleet vehicles performing safely and efficiently.

*What strategies or priorities should the U.S. DOT adopt to achieve the Department's strategic goals and objectives?*

### Update the U.S. New Car Assessment Program

MEMA recommends that DOT and the National Highway Traffic Safety Administration (NHTSA) take on as a top priority updating the U.S. New Car Assessment Program (NCAP) and developing a road map for future updates as per Sec. 24213 of the Infrastructure Investment and Jobs Act.<sup>5</sup> For a decade, MEMA has advocated that NCAP must be upgraded to include ratings for crash avoidance and mitigation technologies. An improved voluntary NCAP ratings system will better inform consumers about advanced vehicle and occupant safety features and ensure that the public understands the important role that crash avoidance systems play – together with crashworthiness – in determining their safety on the road. In addition to a near-term update of the U.S. NCAP, MEMA further urges DOT/NHTSA to establish a comprehensive, phased-in roadmap with prescribed milestones for future NCAP updates. Having a well-formed plan will provide vital time and certainty needed for product development and planning of vehicle manufacturers and suppliers. Over the past several years, there is a robust public discourse in multiple dockets related to updating the NCAP. Ongoing public stakeholder input is critical to enhancing the Program, but we cannot delay much longer.

Updating the NCAP is important to the U.S. vehicle industry's ability to remain a global leader. Vehicle suppliers and their customers need more certainty; an update would enable U.S. vehicle suppliers to continue making significant domestic investments in vehicle technology, research, development, and deployment. As gaps with our global counterparts grow, other nations stride forward in setting the requisite standards, test procedures, and terminology for these advanced systems. Providing government-endorsed, public safety rating information that is supported by a clear roadmap will, in turn, continue incentivizing industry innovation and evolution of critical

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<sup>4</sup> Registrations for the Year 2020, "U.S. Vehicle Registration Statistics," Hedges & Company, <https://hedgescompany.com/automotive-market-research-statistics/auto-mailing-lists-and-marketing/>

<sup>5</sup> Pub. L. 117-58.

vehicle safety technologies that to reduce crashes and save lives. Additionally, a substantive update to the program will help boost U.S. vehicle industry competitiveness in a global marketplace.

#### Facilitate Deployment Automated Vehicle Technologies

Vehicle suppliers are key innovators and developers of ADS used in AVs. The roll-out of automated technologies requires substantial lead-time, long-term planning, and significant resources. When developing these systems, with multiple customers in mind, vehicle suppliers conduct extensive research and test validation. Widely deployed, automated technologies have the potential to radically improve vehicle safety by reducing fatalities and injuries. On top of saving lives, these technologies can also reduce congestion, improve vehicle fuel efficiency, and enhance personal mobility for older adults and persons with disabilities.

MEMA recommends that DOT prioritize the safe and secure development and deployment of AV technology to realize multiple strategic objectives for the Department and key modal agencies, such as NHTSA, Federal Motor Carrier Safety Administration (FMCSA), and Federal Highway Administration (FHWA). MEMA also encourages DOT to proactively modernize the self-certification model for Federal Motor Vehicle Safety Standards (FMVSS) and Federal Motor Carrier Safety Regulations (FMCSR), as appropriate, to account for advances in these technologies. Furthermore, MEMA recommends DOT continue to support programs like the Voluntary Safety Self-Assessment (VSSA) disclosures.

Vehicle suppliers and their customers must have policy certainty to adequately plan for the safe introduction and long-term deployment of these future technologies. The DOT and NHTSA have recognized that rapidly evolving technology is a challenge for the current, traditional federal system's architecture. Federal policies, foundational regulations, and other voluntary mechanisms are all available and should be utilized in various ways to support innovation and encourage the safe and pragmatic deployment of ADS.

First, MEMA refers DOT to comments we submitted earlier this year to NHTSA about how implementing a variety of strategies is necessary for the U.S. industry to remain a global leader in automated technologies.<sup>6</sup> Second, MEMA encourages DOT to lead and collaborate with other relevant federal agencies to take a "whole of government" approach to advancing automated vehicle technology similar to the DOT's 2021 "Automated Vehicle Comprehensive Plan." Third, MEMA has been advocating for the promulgation of the proposed rule titled "Expansion of Temporary Exemption Program to Domestic Manufacturers for Research, Demonstrations, and Other Purposes." A critical step in the technology development process is to verify and validate the technology through on-road testing. However, the current regulatory framework presents significant challenges for entities other than traditional manufacturers from testing on public roads.<sup>7</sup> This creates a significant hurdle for qualified, non-OEM ADS developers. To be clear, we do not support an open-ended allowance for any entity to test a prototype vehicle on public roads. Instead, we support efforts to create additional opportunities for qualified ADS developers to safely test their vehicles on public roads subject to NHTSA oversight. MEMA is pleased to see this action is on the "Fall 2021 Unified Agenda of Regulatory and Deregulatory Actions" with a target to publish a proposed rule in April of 2022 and we urge DOT to ensure that NHTSA's action stays on target.

Key infrastructure elements are also critical to advanced safety technologies. As such, MEMA recommends that DOT and FHWA finalize, as soon as practicable, the rulemaking amending the Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways. The agency's

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<sup>6</sup> MEMA Comments re: "Framework for Automated Driving System Safety," NHTSA-2020-0106-0769, April 27, 2021.

<sup>7</sup> Section 30112(b)(10) of Title 49, U.S.C.

proposal recognizes the need to modernize and revise the MUTCD to better prepare our nation's traditional infrastructure for an evolving, complex transportation network. MEMA further recommends that DOT consider more frequent updates of the MUTCD to enhance its utility for stakeholders and improve keeping pace with technologies like ADAS, ADS, and V2X. As these advanced technologies interface with the driving environment, standardization is critical to enhancing the reliability and accuracy of these systems. Standardization of roadway information helps the human driver as well as provides a more seamless driving environment state-to-state, further reducing system confusion. Ultimately, the goal is the same – to reap the safety benefits of these systems, our nation must employ policies and standards to enhance their effectiveness to avoid and/or mitigate vehicle crashes and improve mobility.

From a global competitiveness standpoint, it is critical for the U.S. to retain a leadership position in the development of automated technology. As noted earlier, other countries are taking bold steps to incentivize innovation in advanced vehicle technologies that may threaten our nation's ability to stay ahead. DOT should evaluate policy pathways to ensure that the U.S. stays on the leading edge of technology development and deployment. Having more policy certainty enables vehicle suppliers and their customers to continue sustaining their U.S. investments.

### **DOT Strategic Framework – “Climate and Sustainability”**

MEMA shares and supports the DOT's goal to address ways to substantially reduce transportation-related pollution with the objective to be on a path to net-zero emissions by 2050. Supplier innovation provides a multitude of technologies and a wide range of products such as the complex, highly integrated systems that reduce vehicle emissions and improve fuel efficiency. Vehicle suppliers are committed to providing innovative, affordable, and accessible technologies needed to continue reducing vehicle emissions and meet the administration's goals.

*What strategies or priorities should the U.S. DOT adopt to achieve the Department's strategic goals and objectives?*

MEMA encourages DOT to finalize the NHTSA proposed rulemaking on Corporate Average Fuel Economy (CAFE) in a timely manner. MEMA supports the goals of the NHTSA proposal primarily because the agency's approach of performance-based standards and a framework that encourages a broad spectrum of advanced technologies.<sup>8</sup> This includes a wide range of electrification technologies as well as further advances to the internal combustion engine, thus improving the fuel efficiency of all vehicles. An array of technologies can play a part in meeting our nation's goals.

In addition, MEMA urges the DOT to ensure there is coordination of regulatory programs between NHTSA's fuel economy and U.S. Environmental Protection Agency's (EPA) greenhouse gas vehicle emissions standards – at least by model year 2026. Working together, the agencies can strive to properly align in stringency, streamline compliance, and reduce unnecessary burden. The stability of harmonized technology approaches is critical as technology investments become more diversified.

Beyond 2026, MEMA supports a program that continues to allow multiple pathways for compliance and utilizes a broad spectrum of advanced technologies to meet our nation's ambitious goals. Vehicle suppliers stand ready to help the industry meet the goal in Executive Order “Strengthening American Leadership in Clean Cars and Trucks” of 50 percent zero emission vehicles (ZEVs) by 2030.<sup>9</sup> The transition to higher levels of electrification and other advanced

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<sup>8</sup> MEMA Comments re: NPRM “Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks” Docket ID No. NHTSA-2021-0053-1528, October 26, 2021.

<sup>9</sup> 86 Fed Reg 43583, E.O. 14037, August 5, 2021.

technologies must be partnered with cohesive complementary policies addressing both supply and demand for these technologies.

MEMA encourages DOT to continue to support a transition to cleaner transportation, which leverages American innovation to drive the U.S. toward a broad spectrum of advanced technologies that can all play a part in meeting the nation's long-term goals. As the nation transitions toward a cleaner transportation future, diverse advanced propulsion technologies will help maintain the appropriate balance between consumer choice and vehicle affordability while also strengthening the American workforce and the vehicle supplier sector. Moreover, having a variety of technologies enhances the global competitiveness of vehicle suppliers.

### **Conclusion**

Now, more than ever, the U.S. vehicle industry is at a critical inflection point as it envisions an ambitious future of zero emissions and zero fatalities with new, cutting-edge powertrain and advanced safety technologies. The U.S. must stay in the lead on key vehicle technologies to strengthen domestic investments and remain globally competitive on emerging technologies. Strong supportive policies and balanced actions from DOT can provide the certainty vehicle suppliers and their customers need to continue critical U.S. development and deployment.

MEMA appreciates DOT's consideration of our comments on the Department's goals related to safety and climate and sustainability strategic objectives outlined in the draft Strategic Framework. The DOT is critical to the successful and safe deployment of a multitude of technologies that are consistent with the administration's priorities. MEMA looks forward to an ongoing dialogue with the DOT and its agencies on these important goals and objectives.

Sincerely,

A handwritten signature in black ink that reads "Leigh S. Merino". The signature is written in a cursive style and is contained within a thin black rectangular border.

Leigh S. Merino  
Vice President, Regulatory Affairs