

December 18, 2020

James C. Owens
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington, DC 20590

Re: Advance Notice of Proposed Rulemaking on Framework for Automated Driving System Safety, Docket No. NHTSA-2020-0106, 85 Fed. Reg. 78058

Dear Deputy Administrator Owens,

The undersigned organizations represent a wide cross section of stakeholders in the autonomous vehicle industry. We write to request a 60-day extension of the comment period for the National Highway Traffic Safety Administration's ("NHTSA") advance notice of proposed rulemaking ("ANPRM") regarding the Framework for Automated Driving System Safety published in the Federal Register on December 3, 2020.¹

We appreciate NHTSA's leadership on automated driving systems ("ADS") and autonomous vehicles ("AVs") and welcome the agency's efforts to develop a framework for ADS safety through this ANPRM. The ANPRM raises a substantial number of technical and policy questions that require significant discussion and analysis on the part of our respective members. An extension would offer these stakeholders enough time to consult with and seek input from experts across their businesses, including the engineering, legal, and compliance functions, about the many complex issues presented in the ANPRM. Having additional time to engage in such consultations would enable stakeholders to better ensure that the comments they provide to NHTSA reflect the full measure of thought and analysis that is due for this important proceeding.

We therefore respectfully request a 60-day extension of the comment period for the ANPRM to allow enough time for the stakeholders we represent to complete their work. We appreciate your consideration of this request and look forward to providing NHTSA with feedback. Should you have any questions, please contact Ariel Wolf, Counsel to the Self-Driving Coalition, at awolf@venable.com.

Sincerely,

Alliance for Automotive Innovation
American Property Casualty Insurance Association
American Trucking Associations
Motor & Equipment Manufacturers Association
National Automotive Dealers Association
National Association of Mutual Insurance Companies
Self-Driving Coalition for Safer Streets
Truck & Engine Manufacturers Association
U.S. Chamber of Commerce, Chamber Technology Engagement Center

¹ U.S. Dep't of Transp., Nat'l Highway Traffic Safety Admin., Framework for Automated Driving System Safety, Advance Notice of Proposed Rulemaking, Docket No. NHTSA-2020-0106, 85 Fed. Reg. 78058 (Dec. 3, 2020), <https://www.govinfo.gov/content/pkg/FR-2020-12-03/pdf/2020-25930.pdf>.