



MEMA Comments to
United States Department of Transportation
Re: Request for Comments
Preparing for the Future of Transportation: Automated Vehicles 3.0
Docket No. DOT-OST-2018-0149
December 7, 2018

Introduction

The Motor & Equipment Manufacturers Association (MEMA) appreciates the opportunity to offer comments to the U.S. Department of Transportation (DOT) regarding its request for comments on guidance entitled *Preparing for the Future of Transportation – Automated Vehicles 3.0*.¹

MEMA represents 1,000 vehicle suppliers that manufacture components and systems for use in passenger cars and heavy trucks providing original equipment to new vehicles as well as aftermarket parts to service and repair vehicles.² Our members lead the way in developing advanced, transformative technologies that enable safer, smarter, and more efficient vehicles, all within a rapidly growing global marketplace with increased regulatory and consumer demands.³

Suppliers are key developers of advanced, transformative technologies that enable safer, smarter, and more efficient vehicles. Today's safety technologies – including advanced driver assistance systems, connected vehicles – provide significant benefits and lay the foundation to an automated vehicle fleet using automated driving systems (ADS). The safety benefits of these technologies, collectively, could substantially reduce traffic fatalities. Vehicle suppliers have made significant investments in research and development, design, and validation testing to produce a wide range of safety innovations for their vehicle manufacturer customers, a.k.a. original equipment manufacturers (OEMs). Working collaboratively with OEMs, suppliers are critical in the ongoing creation, refinement, and implementation of these technologies, which are the building blocks necessary to allow ADS-equipped vehicles to reach their full potential.

Comments on AV “3.0”

MEMA commends DOT on moving forward with the next chapter of automated vehicle guidance with its “3.0” document laying out the framework for our multi-modal transportation ecosystem. Previously, MEMA has applauded the proactive, pragmatic, iterative approach of the “2.0” guidance for automated driving systems (ADS).⁴ The voluntary nature of the guidance accounts for the fast pace of technology development and provides the Department with the flexibility needed to adapt to new information and technology progressions. We believe the Department’s six overarching

¹ 83 Fed Reg 50746

² MEMA represents its members through four divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); Motor & Equipment Remanufacturers Association (MERA); and, Original Equipment Manufacturers Association (OESA). The motor vehicle components manufacturing industry is the largest direct employer of manufacturing jobs in the United States directly employing more than 871,000 Americans, generating a total employment impact of 4.26 million jobs and contributing nearly \$435 billion to the U.S. GDP.

³ [“Driving the Future: The Economic Impact of the Motor Vehicle Parts Manufacturing Industry on the United States,”](#) MEMA and Boston Consulting Group, January 2017.

⁴ NHTSA-2017-0082-2872, Nov. 15, 2017

principles noted in the “3.0” document are suitable guideposts for the modal agencies allowing forward progress without inhibiting innovation.

MEMA appreciates DOT’s consideration of our comments and we offer the following comments and observations.

- MEMA agrees with efforts to increase transparency regarding automated vehicle development in order to increase the public’s understanding of the technology. As stated in our ADAS study⁵ and in our recent input to NHTSA on upgrading the New Car Assessment Program (NCAP),⁶ increasing consumer awareness of current safety technologies will result in greater demand and market deployment of active safety technologies, which are the building blocks for ADS-equipped automated vehicles.
- MEMA supports developing voluntary technical standards as a method to allow ADS/AV technology to rapidly develop. This is necessary as developing and evolving technologies will remain ahead of alternative government standards.
- We recognize the need for the DOT and its agencies to consider ADSs as “drivers and operators,” to eliminate incompatible regulations to allow the development of AV technologies, and to continue the modification and development of NHTSA’s FMVSS standards to support the development of AV technology. Suppliers remain part of the ongoing government-industry dialogue to address these complex issues.
- MEMA also applauds the reaffirmation of self-certification for vehicle technologies including AV technology rather than type approval. At the same time, MEMA encourages the DOT to remain engaged in forums like the UN WP.29 and keep an open dialogue with their global counterparts about potential synergies to collaboratively address advanced technologies.
- MEMA appreciates the DOT’s affirmation about the critical importance of the 5.9 GHz spectrum for vehicle safety applications. We applaud the Department’s continued support to preserve this spectrum for intelligent transportation systems applications. Also, MEMA supports DOT’s endeavors to evaluate – along with the FCC – the impact of potential sharing of unlicensed devices. We recently urged both entities to work closely together to conduct a thorough and complete analysis before making any decisions on sharing.⁷ MEMA has long advocated for the adoption of vehicle-to-vehicle (V2V) and vehicle-to-everything (V2X) communications. We have urged the DOT/NHTSA to finish the rulemaking to require all new light vehicles to be V2V capable.⁸ We believe dedicated short-range communication (DSRC) devices, which enable V2V/V2X communications, are critical safety components that offer secure, reliable, all-weather, and rapid transmissions and have the potential to yield significant safety benefits.
- MEMA continues to support the DOT’s guidance to the states, local governments, tribal governments, and transit authorities – which clarifies their respective roles and reaffirms the “2.0” guidelines. MEMA shares DOT’s caution about how a patchwork of State requirements may impede testing, deployment, and operating ADS-equipped vehicles. The approaches presented in the “3.0” document offers opportunities for all levels of

⁵ [“A Roadmap to Safer Driving Through Advanced Driver Assistance Systems,”](#) MEMA and Boston Consulting Group, Sept. 2015

⁶ NHTSA-2018-0055-0052, Oct. 31, 2018

⁷ MEMA [Comments to FCC](#), ID 1129121114970, Proceeding 13-49, Nov. 28, 2018

⁸ 82 Fed Reg 3854, Docket No. NHTSA-2016-0126

government and industry stakeholders to share best practices, to utilize common terminology, and to seek technical assistance. As the pace of technology development quickens, collaboration will be key to the long-term support needed for success,

- MEMA continues to advocate for the inclusion of commercial vehicles in automation guidelines and looks forward to the Federal Motor Carrier Safety Administration's ANPRM regarding the differentiation of Federal and State governments roles in "the context of ADS-equipped commercial motor vehicles and commercial carriers" as well as the possibility of changes to FMCSA regulations to allow ADS-equipped commercial motor vehicles. As AVs deploy on our nation's roadways, it is important that both light and heavy vehicles are included in the guidelines to increase AV effectiveness and safety.

Conclusion

Suppliers are committed to improving vehicle safety and lead the way in developing the technologies necessary to reduce fatalities and injuries. The "3.0" Guidance builds on the "2.0" federal framework, reaffirms the States' role, and expands AVs to other modal agencies. Guidance is the right approach for the near term as these innovative technologies are rapidly developing and traditional federal standards development simply cannot keep pace. This gives the Department and industry stakeholders the ability to be transparent with the public as well as flexible in developing future policies impacting ADS-equipped vehicles. Moreover, this latest guidance can help all government and industry stakeholders better assess the impacts that AVs and related infrastructure elements will have on the different modes in order to fully enable mobility and support a comprehensive, cutting-edge U.S. transportation network.

MEMA is pleased to have the opportunity to provide DOT with our general observations on the "3.0" Guidance document and we look forward to continued dialogue with the Department and its agencies on the importance of the innovative technologies that suppliers produce. For more information, please contact Chief Technology Officer Brian Daugherty at bdaugherty@mema.org, (248) 430-5966 or Senior Director of Regulatory Affairs Leigh Merino at lmerino@mema.org, (202) 312-9249.

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