

April 10, 2017

The Honorable Jack Danielson
Executive Director
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Request for Comment on “Federal Motor Vehicle Safety Standards (FMVSS) No. 150: Vehicle-To-Vehicle (V2V) Communication Technology for Light Vehicles;” Docket No. NHTSA-2016-0126

Dear Executive Director Danielson:

The Insurance Institute for Highway Safety (IIHS) is pleased to comment on the National Highway Traffic Safety Administration’s (NHTSA) Notice of Proposed Rulemaking (NPRM) for “FMVSS No. 150: Vehicle-To-Vehicle Communication Technology for Light Vehicles.” This addition to FMVSS requires all light vehicles to be equipped with vehicle to vehicle (V2V) technologies that will enable them to send and receive Basic Safety Messages (BSM) to other vehicles. IIHS has reviewed the NPRM for FMVSS No. 150 and previously submitted comments for the “Advance Notice of Proposed Rulemaking (ANPRM); Federal Motor Vehicle Safety Standards: V2V Communications” on October 20, 2014 (IIHS 2014a).

IIHS supports FMVSS No. 150 and its phase-in schedule to make V2V communication standard on all light vehicles by 2023. This mandate will be beneficial as its timing closely corresponds with the automotive manufacturers’ commitment to make autonomous emergency braking (AEB) standard on all vehicles by 2022 (IIHS 2016a). The Highway Loss Data Institute (HLDI) has repeatedly shown that current AEB systems are effective at reducing insurance claims (HLDI, 2011, 2012a, 2012b, 2013, 2014b). IIHS agrees that adding V2V technologies has the potential to make AEB systems with resident-only sensors even more effective by expanding detection range and accounting for other crash scenarios such as intersections. Resident-only systems have limited capability in preventing intersection crashes, and adding V2V has the potential to help mitigate the 8,446 deaths that occurred in intersection crashes during 2015 (IIHS 2016b).

Fleet penetration research done by IIHS estimates that it takes about 30 years after a mandate for safety features to penetrate 95 percent of all registered light vehicles (HLDI, 2014c). Based on these estimates, the proposed mandate would lead to nearly full fleet penetration of V2V-capable light vehicles by 2053. However, the proposal only requires vehicles to be able to send and receive the BSMs without any requirement on how those messages should be used. IIHS believes rulemaking which outlines specific uses for the BSMs should quickly follow this NPRM to enable the full benefits of V2V to be reached as soon as possible.

IIHS is appreciative of the NHTSA’s continued efforts to require essential technologies to enable and enhance crash avoidance systems and lead to further reductions of losses on our nation’s roads.

Sincerely,



David Aylor
Manager of Active Safety Testing

Jack Danielson
April 10, 2017
Page 2

References

Highway Loss Data Institute. 2011. Buick collision avoidance features: initial results. *Bulletin* 28:22. Arlington, VA.

Highway Loss Data Institute. 2012a. Mercedes-Benz collision avoidance features: initial results. *Bulletin* 29:7. Arlington, VA.

Highway Loss Data Institute. 2012b. Volvo City Safety loss experience: an update. *Bulletin* 29:23. Arlington, VA.

Highway Loss Data Institute. 2013. Acura collision avoidance features: an update. *Bulletin* 30:15. Arlington, VA.

Highway Loss Data Institute. 2014b. Honda Accord collision avoidance features: an update. *Bulletin* 31:16. Arlington, VA.

Highway Loss Data Institute. 2014c. Predicted availability of safety features on registered vehicles: an update. *Bulletin* 31:15. Arlington, VA.

Insurance Institute for Highway Safety. 2014a. Advance Notice of Proposed Rulemaking; Federal Motor Vehicle Safety Standards: Vehicle-to-Vehicle (V2V) Communications; 49 CFR Part 571; Docket No. NHTSA-2014-0022. *Request for Comment*. Arlington, VA.

Insurance Institute for Highway Safety. 2016a. U.S. DOT and IIHS announce historic commitment of 20 automakers to make automatic emergency braking standard on new vehicles. *IIHS News*. Arlington, VA.

Insurance Institute for Highway Safety. 2016b. <http://www.iihs.org/iihs/topics/t/roadway-and-environment/fatalityfacts/roadway-and-environment>.