



July 25, 2023
Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, D.C. 20590

**RE: Notice of Request for Comment; Updates to the New Car Assessment Program
[Docket No. NHTSA-2023-0020]**

Dear Acting Administrator Carlson,

MEMA, The Vehicle Suppliers Association, (MEMA) submits these comments to the National Highway Traffic Safety Administration (NHTSA) on its request for comments seeking a new collection of information on the proposal to update the New Car Assessment Program (NCAP) to provide consumers with information about crashworthiness pedestrian protection of new vehicles.

MEMA, The Vehicle Suppliers Association, is the leading trade association in North America for vehicle suppliers, parts manufacturers, and remanufacturers. It has been the voice of the vehicle supplier industry since 1904.

Automotive and commercial vehicle suppliers are the largest employer of manufacturing jobs in the United States employing over 900,000 people throughout the country. 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.

Suppliers lead the way in new vehicle innovations. Member companies conceive, design, and manufacture the OE systems and technologies that make up two-thirds of the value of every new vehicle and supply the automotive aftermarket with the parts that keep millions of vehicles on the road, fueling international commerce and meeting society's transportation needs. MEMA members are committed to safety and sustainability.

Vehicle suppliers play a crucial role as the innovators and manufacturers of a multitude of technologies and a wide range of components, systems and materials that improve vehicle safety, emissions, and efficiency. NCAP is meant to incentivize vehicle manufacturers to exceed the minimum safety requirements and provide that information to consumers to assist them in their purchasing decisions. However, without regular updates, NCAP has fallen behind similar standard programs in other markets in regions such as Europe and Asia. Without the necessary improvements, the safety benefits of newly developed systems are not captured by



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the current standards, leading to a lack of incentive for manufacturers to develop these technologies. MEMA has long-urged NHTSA to modernize the NCAP in a meaningful way to provide consumers with better information on the safety of their vehicles.

NHTSA's current request for public comments is about its intention to provide consumers with information about crashworthiness pedestrian protection of new vehicles. MEMA is pleased that the NHTSA is taking the step to provide consumers with better information, while encouraging safety improvements. MEMA agrees with the agency's move to mirror EURO NCAP in protecting pedestrians. MEMA is further encouraged by the agency's recent proposed rulemakings that will mandate automatic emergency braking (AEB) technology in both light and heavy-duty vehicles. MEMA supports NHTSA in its endeavors to improve vehicle safety.

MEMA is eager for the AEB rulemaking as well as updates to crashworthiness pedestrian protection and further upgrades to the NCAP. Unfortunately, the industry has now witnessed several cycles in which research has been funded and carried out but without any tangible upgrade to the NCAP and, and therefore, no improvement to the safety information conveyed to consumers. MEMA is discouraged that NHTSA did not use this opportunity to provide more substantive updates to the NCAP, something we have advocated for numerous times in the last decade. These upgrades are even more necessary to support the AEB rulemakings, as well as further development of safety-related technologies. Consequently, MEMA stresses the need for demonstrable progress to be made within the coming months. MEMA supports NHTSA's endeavor to improve the information given to consumers and eagerly await the agency's promise of its forthcoming proposal to upgrade and update the NCAP. To further this objective, MEMA requests an opportunity to meet with you and your team to discuss immediate, consequential improvements that can be made to NCAP that will save lives.

MEMA appreciates NHTSA's consideration of our comments as it prepares to update the NCAP. For more information or questions, please contact Alex Boesenberg, MEMA vice president of regulatory affairs at aboesenberg@mema.org.

Sincerely,

A handwritten signature in black ink that reads "Ann Wilson".

Ann Wilson

Sr. Vice President

MEMA, The Vehicle Suppliers Association | mema.org

CC: Jennifer N. Dang, Division Chief, New Car Assessment Program, Office of Crashworthiness

mema.

The Vehicle Suppliers Association

Standards, NHTSA