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April 15, 2026

The Honorable Jonathan Morrison
Administrator, National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Federal Motor Vehicle Safety Standards (FMVSS) Modernization for Automated Driving System (ADS)-Equipped Vehicles (Dockets No. 2026-0628, 2026-0629, 2026-0630)

Dear Administrator Morrison,

The Consumer Technology Association (CTA) supports the National Highway Traffic Safety Administration's (NHTSA) proposed updates to Federal Motor Vehicle Safety Standards (FMVSS) Nos. 102, 103, 104, and 110 to accommodate automated driving system (ADS)-equipped vehicles. CTA appreciates NHTSA's efforts to modernize these standards to enable the safe deployment of vehicles without manual driving controls while maintaining safety.

As North America's largest technology trade association, CTA represents the \$565 billion U.S. consumer technology industry, supporting more than 18 million U.S. jobs. Our members include companies at the forefront of vehicle technology, including manufacturers, suppliers, software developers, and transportation platforms deploying ADS-related innovations.

CTA has consistently supported a national framework enabling the safe deployment of both light and heavy-duty automated vehicles. These technologies improve roadway safety, strengthen supply chain efficiency, and enhance U.S. economic competitiveness.

CTA agrees that FMVSS Nos. 102, 103, 104, and 110 should be updated to reflect the design and operation of ADS-equipped vehicles without manually operated driving controls. Specifically, NHTSA should:

- Exempt such vehicles from transmission shift position display requirements (FMVSS No. 102);¹
- Exempt such vehicles from windshield defrosting and debugging requirements (FMVSS No. 103);²
- Exempt such vehicles from windshield wiping and washing systems (FMVSS No. 104);³ and
- Allow flexibility in informational placard placement where no driver's side exists (FMVSS No. 110).⁴

Modernizing FMVSS for ADS

The FMVSS were developed for vehicles operated by human drivers. As ADS-equipped vehicles evolve, NHTSA should continue updating these standards to maintain safety while enabling innovation. These updates will expand mobility for seniors, individuals with disabilities, and others who cannot or do not drive.

Modernizing FMVSS is also critical to maintaining U.S. leadership in automated vehicle technology. CTA supports NHTSA's forthcoming actions, as outlined in the Spring 2025 Unified Agenda of Regulatory and Deregulatory Actions, including:

- FMVSS No. 108 ("Lamps, reflective devices, and associated equipment"), which would address applicability for ADS-equipped vehicles without manually operated driving controls;
- FMVSS No. 111 ("Rear Visibility"), which would address applicability for ADS-equipped vehicles without manually operated driving controls; and
- FMVSS No. 127 ("Light Vehicle Automatic Emergency Braking"), which would extend the compliance time by two years.

Additionally, CTA encourages NHTSA to build on this work by modernizing additional FMVSS to address their applicability to ADS-equipped vehicles without manually operated driving controls, including⁵:

- FMVSS No. 124: Accelerator Control Systems
- FMVSS No. 126: Electronic Stability Control Systems for Light Vehicles
- FMVSS No. 135: Light Vehicle Brake Systems
- FMVSS No. 138: Tire Pressure Monitoring Systems
- FMVSS No. 201: Occupant Protection in Interior Impact
- FMVSS No. 205: Glazing Materials
- FMVSS No. 208: Occupant Crash Protection

¹ NHTSA, *Federal Motor Vehicle Safety Standards; Modernization of FMVSS No. 102 To Accommodate ADS-Equipped Vehicles*, 91 Fed. Reg. 12532 (March 16, 2026).

² NHTSA, *Federal Motor Vehicle Safety Standards; Modernization of FMVSS No. 103 and FMVSS No. 104 to Accommodate ADS-Equipped Vehicles*, 91 Fed. Reg. 12537 (March 16, 2026).

³ Id.

⁴ NHTSA, *Federal Motor Vehicle Safety Standards; Modernization of FMVSS No. 110 To Accommodate ADS-Equipped Vehicles*, 91 Fed. Reg. 16172 (April 1, 2026).

⁵ NHTSA, *FMVSS Considerations for Vehicles with Automated Driving Systems (2020-2025)*.

Several existing requirements act as unintentional barriers to safety-critical advanced vehicle technologies. Addressing these barriers will support safe deployment while preserving NHTSA's safety mission.

CTA appreciates NHTSA's leadership on automated vehicle safety and innovation and welcomes continued engagement on these proposals.

Sincerely,

/s/ Michael Petricone
Senior Vice President, Government Affairs
Consumer Technology Association

/s/ Samuel Negatu
Director, Government Affairs
Consumer Technology Association