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February 23, 2026

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

Re: Proposal for a New United Nations Global Technical Regulation on Automated Driving Systems, Docket No. 2026-0034

Dear Administrator Morrison,

The Consumer Technology Association's (CTA) Automated Vehicle Working Group (AVWG) appreciates the opportunity to provide comments in response to the National Highway Traffic Safety Administration's (NHTSA) request for input on the Proposal for a New United Nations Global Technical Regulation (GTR) on Automated Driving Systems (ADS).

CTA also appreciated your participation at CES 2026, where discussions across industry, government, and safety stakeholders reinforced both the pace of ADS innovation and the importance of clear, technology-neutral regulatory frameworks. Those themes are directly relevant to NHTSA's engagement on international regulatory initiatives such as this proposed GTR.

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

CTA's AVWG commends the continued work of the United Nations Working Party on Automated/Autonomous and Connected Vehicles (GRVA) to develop harmonized performance requirements and assessment methods for ADS-equipped vehicles. Harmonization efforts play a vital role in promoting safety, supporting innovation, and reducing regulatory fragmentation across jurisdictions.

We agree with GRVA's recognition that "for automated vehicles to [fulfill] their potential, in particular to improve road transport, they must be placed on the market in a way that reassures

road users of their safety.”<sup>1</sup> We also acknowledge the value of regulatory frameworks that promote safety, clarity, and consistency for manufacturers, technology developers, and road users.

CTA’s AVWG supports regulatory approaches that advance the safe development and deployment of ADS technologies while keeping alignment with U.S. statutory and regulatory frameworks. In that spirit, we respectfully offer the following recommendations for NHTSA’s consideration:

- **Promote Compatibility with U.S. Regulatory Frameworks:** Given the GTR’s potential influence on future U.S. regulatory actions, CTA encourages NHTSA to evaluate how key provisions—including those addressing ADS-human interactions and manufacturer safety cases—align with existing and anticipated U.S. regulatory structures. Continued attention to consistency with domestic safety frameworks, evolving ADS policies, and the practical application of Federal Motor Vehicle Safety Standards (FMVSS) will help avoid unintended conflicts and support effective implementation.
- **Assess Reporting and Compliance Mechanisms:** CTA recommends careful consideration of the feasibility and safety value of proposed reporting, monitoring, and compliance elements, including post-deployment assessments and in-service monitoring and reporting (ISMR). Ensuring that such mechanisms are technologically achievable, risk-based, and proportionate will promote safety objectives without imposing unnecessary barriers to innovation.
- **Maintain Deference to Existing Privacy Laws:** CTA supports language recognizing that GTR requirements operate alongside applicable domestic laws governing data access, privacy, and protection. Preserving this principle is particularly important within the U.S. legal framework, where privacy and data governance responsibilities are distributed across federal and state authorities. Clarity and flexibility in this area will reduce legal uncertainty and support compliance.

CTA appreciates NHTSA’s leadership and engagement in international regulatory discussions affecting ADS technologies and welcomes continued dialogue as these frameworks evolve.

Sincerely,



Gary Shapiro  
CEO and Executive Chair  
Consumer Technology Association

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<sup>1</sup> UNECE’s World Forum for Harmonization of Vehicle Regulations’ (WP.29) Working Party on Automated/Autonomous and Connected Vehicles (GRVA): Informal Working Group on Automated Driving System, “Proposal for a new United Nations Global Technical Regulation on Automated Driving Systems (ADS),” ECE/TRANS/WP.29/GRVA/2026/2, p.3 (November 10, 2025), <https://unece.org/sites/default/files/2026-01/ECE-TRANS-WP.29-GRVA-2026-02e.pdf> (accessed February 23, 2026).