

# IMPAIRED DRIVING

## ADVANCED NOTICE OF PROPOSED RULEMAKING

Auto Innovators provided comments on NHTSA's ANPRM on Advanced Impaired Driving Prevention Technology. NHTSA issued the ANPRM because of Congressional direction in the Infrastructure Investment and Jobs Act (IIJA).

Auto Innovators represents the full auto industry and is committed to a **cleaner, safer, and smarter** personal transportation future. Helping reduce impaired driving is part of that commitment. The engineering solution coupled with understanding how consumers will interact with the technology are critical to achieving this goal and require substantial engagement and collaboration to ensure effective implementation. **The auto industry is committed to working with NHTSA and other stakeholders to explore these challenges and help save lives lost to drunk and impaired driving.**

- Since 2000, drunk driving has been implicated in roughly one-third of the fatalities on our nation's roadways. Implementing technology that helps reduce drunk driving will save lives.
  - » Auto Innovators urges NHTSA to **adopt a phased approach** where the first priority should be on addressing alcohol impaired driving.
  - » NHTSA should be **technology-neutral** and should allow for multiple compliance options.
  - » Auto Innovators recognizes that there could be safety benefits in addressing other underlying forms of impairment.
- Different forms of impairment require **different types of intervention** and the type of impairment dictates whether intervention is more appropriate before a trip has commenced or during a trip. The appropriate countermeasure also depends on the type of impairment.
  - » **Alcohol impaired driving.** More stringent or persistent countermeasures may be needed, and may need to occur before a trip commences.
  - » **Driver distraction.** This can be quickly resolved if the driver refocuses back to the roadway environment and may be resolved by a warning during a trip.
  - » **Driver drowsiness.** There are strategies to manage a driver's level of alertness on a temporary basis, such as recommending a break.
- How the rules and regulations get implemented will impact consumer acceptance. **Consumer acceptance is required for the technology to have the most impact** and save the most lives.
- This **rulemaking raises complex** issues including the definition of impairment, how false positives or false negatives are addressed, consumer disabling of technology, and how outstanding technical issues are resolved will be key for NHTSA to address in the NPRM.
- Efforts to address alcohol-impaired driving through the use of vehicle technology **should be done in parallel** with enhanced education, laws, and enforcement.
- Fleet turnover takes time, and it is important that agencies ensure that the appropriate resources are available to foster further reductions in impaired driving fatalities and injuries.