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Auto Innovators recommends that NHTSA amend the system to facilitate Reporting Entities submitting supplemental information to any incident report in a narrative form, with or without a request for confidential treatment, if so desired. Such information may be submitted, at the Reporting Entity's discretion, as part of its monthly report and may identify previously submitted reports by their unique report number. As noted above, the agency has requested that subsequent reports contain the information from prior reports. In situations where multiple subsequent reports are necessary, it is likely that the character limit for the current narrative section will be reached.

*34. How is a Reporting Entity to state the reason why it cannot respond to a specific item requested on the Incident Report? Does that apply when the Incident Report form permits responding with "Unknown"?*

Auto Innovators recommends that if an item is marked "unknown" on the incident report form, no explanation is needed by the Reporting Entity. If any explanation *does* exist, it may be listed in the narrative portion of the form.

*35. How will NHTSA notify companies who may not otherwise be listed under the Service List for SGO 2021-01?*

Auto Innovators recommends that companies not listed on the Service List are not required to submit Incident Reports and therefore not required to be notified unless and until NHTSA serves them with the SGO.

*36. If NHTSA plans to make these reports public, does it also intend to include a disclaimer that the content of the report has not necessarily been verified and in many cases are allegations only?*

Auto Innovators recommends that NHTSA provide a clear and prominent disclaimer that any information published in its aggregate reports or otherwise made available to the general public will not have been verified by NHTSA and only represents unconfirmed reporting by the Reporting Entities. Any report that has not been explicitly confirmed by the manufacturer will be prominently marked "alleged." This is consistent with how reporting under the Takata inflator rupture General Order identified "confirmed" fatalities and injuries and we recommend the agency adopt a similar methodology under the present Order.

*37. Does NHTSA intend to consider a process on CBI similar to the EWR class determinations in the future?*

We understand the incident report form to include a number of check boxes to indicate the presence of CBI. Auto Innovators recommends that any portion of the incident report form whose box indicates CBI should be removed from the report before being made public outside of the agency. Auto Innovators also recommends that NHTSA establish a class determination under Appendix B of Part 512 for the categories of SGO reports that NHTSA has already determined to be entitled to confidential business information protection, to mitigate the burden of preparing Part 512 justifications for such information.