

September 5, 2025

Mr. Loren A. Smith, Jr.
Deputy Assistant Secretary for Transportation Policy
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

RE: U.S DOT Strategic Plan

Dear Deputy Assistant Secretary Smith:

Alliance for Automotive Innovation (Auto Innovators) is pleased to submit comments to the U.S. Department of Transportation (Department) in response to its request for input into the development of the Department's Strategic Plan for fiscal years 2026-2030.

Auto Innovators represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector.

In developing its next strategic plan, we encourage the Department to focus on three priorities that can improve our transportation systems: (1) reducing and harmonizing regulatory approaches; (2) fostering innovation in next-generation transportation technologies; and (3) reforming the National Highway Traffic Safety Administration (NHTSA) to more effectively and efficiently deliver on its motor vehicle safety mission.

Reducing and Harmonizing Regulatory Approaches

Auto Innovators appreciates Secretary Duffy's prioritization of and focus on deregulatory opportunities. The Department's next strategic plan should continue to advance these efforts.

In May, in response to the Department's Request for Information on Regulatory Reform, Auto Innovators identified 30 regulations that could be modified or repealed to ensure that the Department's administrative actions do not undermine the national interest and that the Department achieves meaningful burden reduction while continuing to meet its statutory obligations and ensure that safety of the U.S. transportation system. For example, we encouraged the Department to revise its Automatic Emergency Braking (AEB) / Pedestrian Automatic Emergency Braking (PAEB) rule to align with current system capabilities and technology maturity, to modernize outdated lighting standards, and to revise or repeal overly burdensome legacy bumper standards. We also identified

several general practices that the Department could adopt to support its broader regulatory reform efforts going forward. This includes increasing public notice time and collaboration with stakeholders, increasing compliance lead times, expediting responses to petitions and requests for legal interpretations, and modernizing cost-benefit analyses.

In addition to furthering these deregulatory opportunities, the strategic plan should focus on fostering a stable, reasonable, and aligned regulatory environment. Due to its multi-year design and manufacturing cycles and the significant capital expenditures necessary to bring new vehicle technologies to the market, the need for regulatory certainty and alignment is particularly acute for the auto industry.

In particular, the Department should revise fuel economy standards to reflect current market realities, preserve consumer choice, maintain the global competitiveness of the U.S. auto industry, and provide auto companies with the certainty that they need to invest, innovate, and manufacture in the U.S. In doing so, the Department should coordinate closely with the Environmental Protection Agency and the Department of Energy on complementary regulatory activity.

In addition, the Department should prioritize efforts to make federal motor vehicle safety standards consistent with standards that have been implemented in other parts of the world. Such consistency can maintain vehicle safety while also reducing costs to consumers and facilitating exports from the U.S. to other countries. For instance, the Department should seek to align standards on pedestrian protection and Automated Driving Systems with existing global standards.

Fostering Innovation in Next-Generation Transportation Technologies

In the next strategic plan, the Department should also concentrate on fostering the development and deployment of next-generation automotive technologies that can make the U.S. transportation system safer and more efficient. If the U.S. wants to remain at the forefront of automotive innovation, it cannot afford to fall behind China in the development of these advanced technologies.

Specifically, the Department should accelerate its efforts to implement a long-overdue federal regulatory framework for autonomous vehicles. We appreciate the Department's commitment to autonomous vehicles and are grateful for the actions that have already been taken in furtherance of this goal. We encourage the Department to continue its efforts by updating existing motor vehicle safety standards to accommodate autonomous vehicles and by addressing current statutory and regulatory barriers stemming from "make inoperative" and manual controls requirements that limit the development of dual-use autonomous vehicles and non-conventionally designed Level 4 and Level 5 vehicles.

The Department should also identify opportunities for advancing the deployment of vehicle-to-everything (V2X) technology. V2X facilitates the communication of data between vehicles and roadway infrastructure, including road signs and traffic lights. It can provide drivers with real-time alerts about road conditions, construction zones, crashes, or other hazards and support transportation planners in improving traffic flows by setting variable speed limits or adjusting traffic signal phase

and timing. As part of its strategic plan, the Department should articulate its vision for and commitment to V2X innovation in the U.S. As part of this, the Department should consider prioritizing funding for V2X-enabled infrastructure within existing transportation resources or identifying a source of dedicated federal funding for V2X-enabled infrastructure.

Finally, as auto manufacturers continue to manufacture and sell electric vehicles in the U.S. to meet consumer demand, the need for robust, reliable, and accessible charging infrastructure remains. As part of its next strategic plan, the Department should consider how it intends to facilitate the build out of this important infrastructure. By supporting electric vehicle charging and hydrogen fueling infrastructure, the Department can help ensure that consumers who want to purchase these technologies but do not have access to home charging are able to do so.

Improving Safety on our Nation's Roadways

The U.S. continues to experience an unacceptably high number of traffic-related fatalities. As part of its next strategic plan, the Department should promote and advance a holistic approach to roadway safety that recognizes and addresses the role that infrastructure improvements, post-crash care, education, and enforcement of traffic laws play.

The Department's strategic plan should also focus on reimagining NHTSA to help it deliver on its roadway safety mission more effectively and more efficiently. This includes developing Vehicle Safety Rulemaking and Research Priority plans that can help ensure awareness and alignment among industry, stakeholders, and the agency and accelerate investments by industry into innovative safety technologies. This also includes modernizing the New Car Assessment Program to accelerate the development and deployment of advanced safety technologies, promote greater consumer awareness of key aspects of vehicle safety performance, and provide data to NHTSA to inform future rulemaking.

Auto Innovators welcomes the opportunity to provide input into the Department's next strategic plan and to continue to work with the Department on matters critical to the auto industry.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hilary M. Cain', with a stylized flourish at the end.

Hilary M. Cain
Senior Vice President, Policy