



July 12, 2021

Mr. Raymond R. Posten  
Associate Administrator for Rulemaking  
National Highway Traffic Safety Administration  
1200 New Jersey Ave, SE  
Washington, D.C., 20590

**RE: Agency Information Collection Activities; Notice and Request for Comments;  
Consolidated Vehicles' Owner's Manual Requirements for Motor Vehicles and  
Motor Vehicle Equipment (May 12, 2021)**

Dear Mr. Posten,

The Alliance for Automotive Innovation (“Auto Innovators”) appreciates the opportunity to provide input in response to the National Highway Traffic Safety Administration’s (“NHTSA”) notice and request for comments on a reinstatement (with modification) of a previously approved information collection on Vehicle Owner's Manual Requirements for Motor Vehicles and Motor Vehicle Equipment.<sup>1</sup>

In responding to this notice, Auto Innovators provides no specific comments on the accuracy of the agency’s estimates of the burden of the proposed collection, or the validity of the methodology and assumptions used. However, we believe there are significant opportunities to enhance the quality, practical utility, and clarity of information, and minimize the overall burden associated with this information collection activity and the corresponding regulatory requirements related to the vehicle owner’s manual.

The vehicle owner’s manual is an important tool for providing owners with relevant information related to the safety, performance, and maintenance of a motor vehicle. As indicated in the request for comment, “*the Secretary (NHTSA by delegation) is authorized, at 49 U.S.C. 30117, to require manufacturers to provide information to first purchasers of motor vehicles or items of motor vehicle equipment related to performance and safety in printed materials that are attached to or accompany the motor vehicle or item of motor vehicle equipment.*” However, we believe the agency has discretion in terms of the information that must be provided in “printed matter” to the first purchaser of the vehicle, and recommend that NHTSA consider the development of new compliance options to permit digital format owners' manuals in lieu of hard copy (printed) owners' manuals.<sup>2</sup>

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<sup>1</sup> The Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. Its members are listed as follows: Aisin Group, APTIV, Argo AI, BMW Group, Bosch, Byton, Cruise, Denso, Ferrari, Ford, GM, HARMAN, Honda, Hyundai, Infineon, Intel, Isuzu, Jaguar Land Rover, Karma, Kia, Local Motors, Luminar, Mazda, Mercedes-Benz, Mitsubishi Motors, Nissan, NXP, Panasonic, Porsche, RV Industry Association, Sirius XM, Stellantis, Subaru, Suzuki, Texas Instruments, Toyota, Volkswagen Group of America and Volvo.

<sup>2</sup> 49 U.S. Code § 30117



The use of electronic means of storing and communicating vehicle owner's manual information can improve the quality, utility, and clarity of information, by providing features and functionality that allow consumers to access relevant information more easily. These technology solutions ensure robust alternatives are provided while not compromising consumer access to relevant and up-to-date vehicle information. The use of electronic means of communication can also be used to improve accessibility in terms of how information may be presented to consumers. For example, using intuitive user interfaces and enhanced search functionality.

Notwithstanding the NHTSA estimated increase in burden related to the modifications outlined in this request for comment, the overall cost and environmental impact of producing current vehicle owner's manuals can be significant. The use of technology alternatives present significant opportunities for reducing overall printing costs and the use of paper-based materials associated with owner's manual production.

The use of digital technologies also has the potential to help minimize unintended costs associated with errors or corrections that may be required after the vehicle is sold to the consumer. For example, in cases where a recall notice may be issued to update or modify the owner's manual contents, it may be possible to update this information remotely without the need for any actions on the part of the consumer.

With advances in new technology, Auto Innovators recommends that NHTSA conduct research in support of rulemaking to permit the use of electronic or digital owners' manuals as a compliance option for providing required information to consumers. Our members are committed to providing input in support of such an analysis and look forward to further engagement on this issue.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Schmidt". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Scott Schmidt  
Vice President, Safety Policy