



October 28, 2024

The Honorable Elizabeth L.D. Cannon
Executive Director
Office of Information and Communications Technology and Services
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Submitted via <https://www.regulations.gov>

**Re: Securing the Information and Communications Technology and
Services Supply Chain: Connected Vehicles
RIN 0694-AJ56 BIS-2024-0005 (Docket No. 240919-0245)**

Dear Executive Director Cannon:

The RV Industry Association (“RVIA”) appreciates the opportunity to comment on the Notice of Proposed Rulemaking from the Department of Commerce and its Bureau of Industry and Security (“BIS”) entitled “Securing the Information and Communications Technology and Services Supply Chain: Connected Vehicles,” 89 Fed. Reg. 79088 (Sept. 26, 2024).

RVIA is the national trade association representing over 500 manufacturers and component and aftermarket suppliers who together build more than 98 percent of all RVs produced in the United States – including motorhomes, travel trailers, fifth-wheel travel trailers, folding camping trailers, park model RVs, and truck campers. RVIA members additionally account for approximately 61.5% of global production.

The RV industry contributes more than \$140 billion annually to the national economy and is an American-made industry that supports 680,000 jobs paying more than \$48 billion in wages. The RV Industry Association is the unifying force for safety and professionalism within the RV industry. It works with federal and state policymakers to promote and protect the RV industry. We take pride in the contributions our industry makes to the U.S. economy and remain committed to expanding our investment in U.S. communities and workforce.

While vehicles, RVs differ from typical passenger vehicles in a variety of major ways – particularly in how they operate on the road, and in frequency of use. Given these key differences, the national security concerns outlined in the initial Executive Order [13873](#) and subsequent documents do not apply to RVs. We propose that BIS further narrow the definition of “connected vehicle” to explicitly exclude RVs.

“Connected” Recreational Vehicles do not pose a national security risk.

The Executive Order and subsequent Advanced Notice of Proposed Rulemaking (April 2024) and Notice of Proposed Rulemaking (September 2024) lay out concerns about the national security

risks with information and communications technology and services (“ICTS”) systems in vehicles, specifically that they present opportunities for surveillance and sabotage from adversaries. After receiving initial comments in April 2024, BIS highlighted concerns about Vehicle Connectivity Systems (“VCS”) and automated driving systems (“ADS”) in the NPRM, narrowing the focus of the rule to those two systems because they are “a target for exploitation related to data exfiltration or remote vehicle manipulation.”

The connectivity of RVs continues to grow across all manufacturers and levels of product, to provide consumers with better, simpler experiences when using their RV. Much of this connectivity is powered by Bluetooth and controlled through phone applications. These technologies are present in RVs, including battery monitors, propane tank level sensors, temperature and thermostat sensors, AC controls, water tank level sensors, water pumps, door locks, awning wind sensors, awning extend and retract, anti-sway mitigation devices, anti-lock brakes, tire pressure monitoring systems, external cameras, antennas, information system touch panels, RV leveling systems, lighting controls, on board generator function, fireplaces, and many others. Manufacturers and suppliers are continuously working to add more connectivity, to provide consumers with information more easily and add to ease of use.

More than 85% of all RVs are towables, with no passengers while on the road and zero risk of remote vehicle manipulation. The vast majority of RVs on the roads in the United States today are towables – meaning they are not self-propelled, but rather pulled behind another vehicle. These are campers – meant for camping in the great outdoors but able to be towed by cars to get from place to place. There are no passengers in the towables while they are being pulled and in fact, most states prohibit this, and they are not designed for passengers while on the road. The national security concerns related to data exfiltration and remote vehicle manipulation are completely absent for these cases – there is no risk. The potential risk would be with the car towing the RV, which would be covered by the rule already.

The average RV is on the road for 20 days per year. Unlike a normal passenger vehicle, consumers use RVs for vacations – not as their primary mode of transportation. According to internal RVIA studies, most consumers (55% of RVers) take short trips, between 4-7 hours away from home, and only have the RV on the road to reach and then leave their camping site. That means that the average RV is on the road far less than passenger vehicles, with current RV owners using their RV on average 20 days per year according to RVIA research.¹ Even new RV purchasers state that they plan to use their RV for 25 days a year on average.² RVs are mobile, but most of the time the vehicle is “in use” is when the RV is parked and stationary.

In the Notice of Proposed Rulemaking, BIS proposes a circumstantial general authorization for which “the conditions of the otherwise prohibited transaction appropriately mitigate the level of risk associated with the particular transaction.” As an example, BIS cites vehicles that will be driven on public roads for fewer than 30 calendar days per year. As described above, this would

¹ Recreation Vehicle Industry Association, *Recreation Vehicle (RV) Owner Demographic Profile 9*, February 2021 (available at https://www.rvia.org/system/files?file=media/file/Go%20RVing%20RV%20Owner%20Demographic%20Profile_final.pdf&check_logged_in=1).

² *Id.*

pertain to the vast majority of RVs. RVIA recommends that instead of applying the rule to RVs and adding the additional administrative burden of applying for the authorization, RVs should be excluded from the definition outright.

Proposed Changes to the Definition of “Connected Vehicle”

Below is the proposed definition of “connected vehicle” from the [background](#) provided by BIS:

“After full consideration of each of the comments, BIS maintains the use of the term “connected vehicle” in the proposed rule. However, BIS proposes to narrow its definition to mean, “[a] vehicle driven or drawn by mechanical power and manufactured primarily for use on public streets, roads, and highways, that integrates onboard networked hardware with automotive software systems to communicate via dedicated short-range communication, cellular telecommunications connectivity, satellite communication, or other wireless spectrum connectivity with any other network or device. Vehicles operated only on a rail line are not included in this definition.” This definition captures the vehicles that would be subject to the rule (e.g., passenger vehicles, motorcycles, buses, small and medium trucks, class 8 commercial trucks, recreational vehicles), while excluding those that pose a less acute risk of data exfiltration, modification, or sabotage by foreign adversaries.”

RVs should be explicitly excluded from this definition. The definition should be further narrowed to say:

*“[a] vehicle driven or drawn by mechanical power and manufactured primarily for use on public streets, roads, and highways, that integrates onboard networked hardware with automotive software systems to communicate via dedicated short-range communication, cellular telecommunications connectivity, satellite communication, or other wireless spectrum connectivity with any other network or device. Vehicles operated only on a rail line **and recreation vehicles** are not included in this definition.”*

In conclusion, while we support BIS’s efforts to ensure American citizens operating their vehicles are safe from countries of concern, RVs are a special case – most are towable, meaning the risk of remote manipulation or surveillance is near zero. RVs are used infrequently, at an average of 20 days per year, much less than the 30-day example BIS gave of a vehicle used infrequently enough to be considered low risk. While vehicles, RVs are not used as primary transportation like the passenger vehicles intended to be covered by this rule. Most are transported by another vehicle and only primarily occupied when at the campsite or end location. Including RVs in the final rule would add a difficult and cumbersome administrative burden, with no impact on national security concerns. We hope BIS will take this into consideration and exclude RVs from the final rule.

Respectfully submitted,



Jason Rano
Vice President, Government Affairs
RV Industry Association