



August 24, 2026

Dr. Cem Hatipoglu
Associate Administrator, Vehicle Safety Research
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Docket No. NHTSA-2025-0787; Agency Information Collection Activities; Notice and Request for Comment; Intelligent Speed Assistance (ISA) User Acceptance and Effectiveness Testing Using Simulator and/or Closed Track Methods

Dear Dr. Hatipoglu:

Alliance for Automotive Innovation (Auto Innovators)¹ appreciates the opportunity to provide input to the National Highway Traffic Safety Administration (NHTSA) on its proposed new information collection activity regarding intelligent speed assistance (ISA) user acceptance and effectiveness.² Auto Innovators offers these comments to help strengthen the practical utility, clarity, and quality of the information collected by encouraging a study design that clearly differentiates among ISA system types, reflects real-world operating conditions, and evaluates the factors most likely to influence driver acceptance and sustained ISA use.

Auto Innovators supports NHTSA's interest in better understanding the relationship between ISA design, driver acceptance, and system effectiveness. As NHTSA notes, the proposed information collection is intended to advance the state of knowledge regarding driver acceptance and effectiveness of different ISA systems and is not immediately intended to inform regulations or policy. To ensure that the resulting information has real-world value, Auto Innovators encourages NHTSA to distinguish clearly among different ISA system designs and feedback modalities, including warning-based, haptic, and speed-

¹ 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.

² <https://www.federalregister.gov/documents/2026/06/25/2026-12835/agency-information-collection-activities-notice-and-request-for-comment-intelligent-speed-assistance>

control approaches, because driver acceptance may vary significantly depending on how the system communicates with or assists the driver.

Auto Innovators also recommends that NHTSA evaluate ISA acceptance using measures that go beyond general favorability or perceived usefulness. The study should assess driver trust in the accuracy and reliability of speed limit information, nuisance or annoyance associated with alerts, understanding of system limitations, willingness to use the system over time, and the likelihood that drivers could override, disable, or otherwise adapt their behavior in response to the system. NHTSA should also consider evaluating drivers' acceptance of the system's default settings, including whether those settings influence drivers' willingness to use ISA over time or their likelihood of overriding or disabling it. These factors are directly relevant to the practical utility of this research because real-world effectiveness will depend not only on whether a system performs in a controlled setting, but also on whether drivers understand, trust, and continue to use the system as intended.

The research should also include realistic scenarios that reflect the complexity of speed limit identification in real-world driving, including temporary speed limits, work zones, school zones, variable speed limits, obscured or missing signs, ramps, adjacent roads with different posted limits, and situations where map-based and sign-based information may conflict. Simulator and closed-track methods can provide useful, controlled comparisons, but NHTSA should be cautious in relying on these methods to draw conclusions about sustained real-world ISA acceptance and effectiveness. For example, simulator methods may be particularly useful for the evaluation of driver responses to specific alert scenarios where repeatable exposure to the same conditions is necessary, provided those findings are thoroughly considered alongside real-world or naturalistic data on sustained use and driver adaptation. Even where scenarios resemble real world conditions, however, simulator studies cannot fully replicate the motivations, contextual cues, perceived risk, and repeated-use dynamics that influence driver behavior outside the research setting. Accordingly, any simulator-based findings should be treated as complementary to, rather than a substitute for, real-world or naturalistic data on sustained driver acceptance, adaptation, and ISA use.

Research indicates that contextual driving conditions, including surrounding traffic and time spent idling, may be more predictive of speeding or other risky driving behaviors than self-reported attitudes alone.³ This understanding underscores the importance of

³ <https://doi.org/10.1016/j.aap.2024.107751>

evaluating ISA in real-world operating conditions rather than relying primarily on simulator-based responses. To improve the practical utility and real-world validity of the research, NHTSA should consider complementing or replacing simulator-based methods with analyses using data from real world systems already in operation, where such data are available and can be appropriately accessed and shared. Such an approach could allow NHTSA to evaluate ISA usage, overrides, disablement, reactivation, and general speeding behavior at greater scale and under naturalistic operating conditions.

Auto Innovators also encourages NHTSA to study factors that may affect ISA acceptance and effectiveness in real-world use. These include driver trust in the accuracy and reliability of speed limit information; conflicts between posted signs, map-based data; temporary traffic control conditions; false positive and false negative alerts; alert timing and frequency; driver understanding of system limitations; override, disablement, and reactivation behavior; and the potential for habituation or alert fatigue over time. Evaluating these factors would help ensure the research captures the behavioral and operational conditions most likely to influence whether drivers understand, trust, and continue to use ISA systems as intended.

Auto Innovators further encourages NHTSA to draw from Europe's experience with ISA while recognizing important differences between the European and U.S. regulatory and operating environments. ISA has been required for new vehicle types in the European Union since 2022 and for all new vehicles sold in the EU since July 2024, but publicly available post-mandate data on real-world user acceptance, override behavior, and disablement rates appears limited at this stage. Earlier European trials and studies suggest that driver acceptance may improve with experience and that acceptance varies by system design, but those findings should be considered in context. NHTSA's proposed research may help fill an important gap by examining not only whether ISA affects speeding behavior in controlled settings, but also which system characteristics are most likely to support real-world driver understanding, trust, and sustained use over time.

Finally, Auto Innovators encourages NHTSA to continue exploring speeding solutions that go beyond vehicle-based technology, consistent with the Safe System approach and recognizing that fleet penetration of new vehicle technologies takes time. Speeding is a complex safety challenge. It is shaped by individual and societal attitudes, infrastructure, and contextual motivators. As a result, increasing driver awareness of speed through technologies like ISA may help some drivers choose more appropriate speeds, but it is unlikely to address all reasons drivers travel above the posted limit.

Auto Innovators appreciates the opportunity to provide input to NHTSA on this proposed information collection. As NHTSA develops this research, the study should prioritize



methods and measures that can meaningfully assess sustained use, driver adaptation, system performance, and acceptance under naturalistic operating conditions. If you have questions or would like to discuss these comments, please feel free to contact me at (202) 326-5517 or via email at lcollins@autosinnovate.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren A. Collins". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lauren A. Collins
Senior Director, Safety Policy
Alliance for Automotive Innovation