



July 30, 2025

Peter Simshauser
Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590
Docket No. NHTSA-2025-0042
RIN 2127-AM93

Dear Mr. Simshauser,

Alliance for Automotive Innovation (Auto Innovators)¹ strongly supports efforts by the Department of Transportation (DOT)² and the Administration³ to repeal or replace regulations that are unnecessary, unlawful, unduly burdensome, outdated, or unsound. We appreciate the National Highway Traffic Safety Administration's (NHTSA) clear commitment to creating a regulatory environment that supports American businesses, particularly as evidenced by the proposal to remove obsolete requirements from FMVSS No. 301.

Auto Innovators supports NHTSA's proposal to amend 49 CFR part 571⁴ Federal Motor Vehicle Safety Standard (FMVSS) No. 301, *Fuel system integrity*, as described.⁵ Auto Innovators agrees that removing text surrounding obsolete instances of phase-in requirements meets NHTSA's deregulatory goals without compromising safety, as the text proposed for deletion is no longer applicable to vehicles produced today.

Auto Innovators also proposes that the agency further streamline regulation §571.301 by:

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 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.regulations.gov/comment/DOT-OST-2025-0026-0798>

³ <https://www.autosinnovate.org/posts/agency-comments/comments-to-omb-on-deregulation>

⁴ <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-V/part-571>

⁵ <https://www.federalregister.gov/documents/2025/05/30/2025-09747/federal-motor-vehicle-safety-standards-no-301-fuel-system-integrity>

- Replacing S7.2 using a revised paragraph S7.2(b),
- Removing S7.2(a), which contains an obsolete compliance date,
- Revising S7.2(b) to remove the date reference and use as S7.2,
- Replacing S7.3 using a revised paragraph S7.3(b),
- Removing S7.3(a), which contains an obsolete compliance date,
- Revising S7.3(b) to remove the date reference and use as S7.3, and
- Removing S8, which contains an obsolete phase-in requirement schedule.

FMVSS No. 301 would then read as follows:

S7.2 Side moving barrier test conditions. The side moving deformable barrier crash test conditions are those specified in S8 of Standard 214 (49 CFR 571.214).

S7.3 Rear moving barrier test conditions. The rear moving deformable barrier is the same as that shown in Figure 2 of Standard No. 214 (49 CFR 571.214) and specified in 49 CFR part 587, except as otherwise specified in paragraph S7.3 (b). The barrier and test vehicle are positioned so that at impact—

(1) The vehicle is stationary;

(2) The deformable face of the barrier is mounted on the barrier 50 mm (2 inches) lower than the height from the ground specified in Figure 2 of Standard No. 214 (49 CFR 571.214) (All dimensions from the ground in Figure 2, Front View should be reduced by 50 mm (2 inches.));

(3) The barrier is traveling 80 ± 1.0 km/h; and

(4) The barrier impacts the test vehicle with the longitudinal centerline of the vehicle parallel to the line of travel and perpendicular to the barrier face within a tolerance of ± 5 degrees. The test vehicle and barrier face are aligned so that the barrier strikes the rear of the vehicle with 70 percent overlap toward either side of the vehicle. So aligned, the barrier face fully engages one half of the rear of the vehicle and partially engages the other half. At impact, the vehicle's longitudinal centerline is located inboard either of the side edges of the barrier by a distance equal to 20 percent of the vehicle's width ± 50 mm (see Figure 3). The vehicle's width is the maximum dimension measured across the widest part of the vehicle, including bumpers and molding, but excluding such components as exterior mirrors, flexible mud flaps, marker lamps, and dual rear wheel configurations.



These changes are consistent with NHTSA's goal of streamlining the CFR to reflect modern regulatory requirements and reduce compliance burdens.

Auto Innovators thanks NHTSA for the issuance of this NPRM. We are happy to answer any specific questions that you may have related to these recommendations, and we look forward to working with you to ensure the safety, competitiveness and efficiency of the U.S. automotive sector. We stand ready to work with the agency to assist in further identifying existing regulations, guidance, paperwork requirements, and other regulatory obligations that can be reconsidered to support the Administration's goal to achieve meaningful regulatory burden reduction while continuing to meet statutory obligations and ensure the continued safety of the U.S. transportation system.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "SP" followed by a horizontal line.

Sarah Puro
Vice President, Safety and Technology Policy
Alliance for Automotive Innovation