

June 8, 2005

Docket Number NHTSA-2005-20936
Docket Management Facility
U.S. Department of Transportation
400 7th Street, S.W.
Washington, DC 20590

**Comments on
NHTSA Request for Comments
Regarding GPS**

Public Citizen applauds the National Highway Traffic Safety Administration's (NHTSA) interest in the safety benefits of the next generation of Global Positioning Systems (GPS).

Development and implementation of GPS-based warning systems would bring many safety benefits. For example, GPS-based automatic collision notification systems have proven effective in improving notification of crashes to emergency responders. Future use of GPS in technologies such as crash warning systems promises additional safety benefits.

Public Citizen offers the following considerations to guide the agency's work on GPS technology applications.

- Public Citizen supports agency investment in development of safety technologies, yet is concerned by NHTSA's continued diversion of resources to exploration of "intelligent" vehicle and highway systems in lieu of long-overdue improvements in basic programs and safety standards. For instance, NHTSA's vehicle crash testing program would greatly benefit from improvements to the agency's load cell barriers. Currently, NHTSA uses inferior barriers that provide far less accurate results than the barriers commonly used in industry crash tests. Another example is the agency's history of languishing effort to make critical improvements to seating systems to protect against seat back failures in crashes. Over 30 years ago, NHTSA proposed a rulemaking that would address seating system safety, yet, to this day, the agency has not taken action to adequately protect occupants from seat back failure. In fact, in November 2004, NHTSA terminated a rulemaking to improve seat performance in rear impact crashes. NHTSA must invest the resources necessary to improve federal standards pertaining to seating systems.

NHTSA has long devoted a significant portion of the agency's resources to "intelligent" vehicle and highway technologies, with little tangible results to show for this investment, and to the detriment of other programs with more assured results. The agency should not funnel a large portion of scarce resources into

long-term programs to the detriment of overdue improvements in basic programs and safety standards.

- Development of GPS-based technologies should proceed in a manner wary of the possibility of malfunctions and data errors. In theory, GPS-technologies, such as intersection collision avoidance and road departure prevention systems, that employ automated vehicle responses, taking control out of the hands of the driver, would reduce driver error and prevent many crashes. However, in reality, such systems could be susceptible to malfunctions and data errors, with potentially disastrous consequences. Also, driver rejection of features that assume control of a vehicle may undermine the feasibility of such systems.

For these reasons, certain GPS-based systems such as intersection collision avoidance and road departure prevention systems would better be used as crash warning systems, alerting drivers to an impending crash. Many crash warning systems raise the danger of driver distraction, and the agency, in considering crash warning systems, must be careful to ensure that crash warning systems effectively warn drivers without contributing to driver distraction.

- GPS-based technology raises serious privacy concerns, as GPS data would allow vehicles to be located and tracked. It is important to ensure that citizen privacy is protected from any abuses of GPS data.

Development and implementation of GPS-based warning systems would bring many safety benefits, and Public Citizen welcomes NHTSA's interest in GPS. NHTSA should explore the potential safety benefits of GPS-based technology, focusing its resources on technologies with the greatest promise of safety benefits and taking care to ensure that GPS data is protected from abuse, while assuring that the agency's other priorities are adequately funded.

Sincerely,

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Public Citizen