



August 25, 2026

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: New Car Assessment Program [Docket No. NHTSA–2026–1156]

The American Association of Motor Vehicle Administrators (AAMVA) thanks the National Highway Traffic Safety Administration (NHTSA) for the opportunity to comment on its proposal to update the New Car Assessment Program (NCAP) by adding rear automatic braking (RAB) systems with pedestrian avoidance ability to the advanced driver assistance systems (ADAS) technologies NHTSA recommends. By evaluating vehicle capabilities and technologies, the NCAP provides consumers with valuable insights to make informed purchase decisions and understand key safety features.

AAMVA supports NHTSA's inclusion of RAB systems with pedestrian avoidance ability into the NCAP. NHTSA's testing shows that RAB systems have the potential to detect pedestrians and other vulnerable road users, automatically intervening to prevent and minimize backover crashes. By curbing these specific types of crashes, RAB systems can protect the most vulnerable road users, particularly children, who suffer a disproportionate number of injuries and fatalities. The addition of RAB systems with pedestrian avoidance ability to the NCAP encourages the safest possible driving environment for all road users.

Since technology performance varies across vehicle models, AAMVA approves of NHTSA's standardized, methodological approach to assess RAB performance across vehicle lines in various test scenarios and conditions involving pedestrians. As ADAS technologies grow more complex, NHTSA's rigorous evaluations are essential to help drivers understand the specific safety systems of different vehicle models. Standardizing how these proprietary features are assessed across brands enhances transparency and improves consumer education. Ultimately, these insights provide buyers with critical safety information about life-saving technologies designed to prevent crashes.

AAMVA also favors the inclusion of RAB into the NCAP roadmap, which outlines a phased strategy for updates to the program and promotes advance crash avoidance, crashworthiness, and vulnerable road user protections. This roadmap highlights the program's evolution by giving consumers clearer safety information while also encouraging manufacturers to adopt emerging safety technologies. These aims further the protection of both vehicle occupants and vulnerable road users.

Integrating life-saving RAB systems with pedestrian detection into the NCAP standardizes assessments across brands, raises consumer awareness of this technology, and strengthens the overall program as a crucial component of its roadmap. AAMVA supports NHTSA in this important effort and looks forward to the program's continued advancement in the years to come.

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