

[Date]

Chief Council
Office of the Chief Council
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE.
Washington, DC 20590

Subject: Safety Assessment Letter

[NHTSA Chief Council],

In accordance with the guidance detailed in the Federal automated vehicles Policy, [Company] is voluntarily submitting a Safety Assessment Letter. This letter provides a summary of how [Company] is addressing the 15 guidance areas that are applicable for the following automated feature:

Automated Feature Description

Company:
Vehicle, System, or Feature name:
SAE J3016 Level:
Primary use/functionality:
Test/deployment:
Release/Deployment/Test Date:

The information assembled here by authorized employees of [Company] is both thorough and accurate. This Safety Assessment Letter is being signed by [**insert title of signor –authorized official at Company**], who has reviewed the submission and is a subject matter expert, or Authorized Company Official, and familiar with all of the information contained in this letter.

[Authorized Company Official]

Guidance Area: Data Recording and Sharing

Company Assessment:

	Development effort for this [feature] / [vehicle] is consistent with the guidance in this area
	Development effort for this [feature] / [vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

OEMs and other entities should briefly describe, in a way that can be shared publicly, why their feature or vehicle is either consistent or inconsistent with the federal guidance in this area, and the story of what they are doing in this area.

OEMs and other entities who are submitting a letter should describe here how they are collecting data onboard, storing it, and using this information to address the areas presented in the guidance. Companies should describe how they plan to store and capture edge cases identified by the feature or vehicle in question, and how they feel that this information can be shared with the industry as a whole in a pre-competitive fashion.

OEMs and other entities should discuss here if they are partnering with industry consensus standards bodies, or other private or governmental organizations to begin this sharing process if no process is currently in place.

If OEMs and other entities choose to decide that this guidance area is not applicable, they should use this space to tell why this guidance area is not applicable

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Privacy

Company Assessment:

	Development effort for this [feature]/[vehicle] is consistent with the guidance in this area
	Development effort for this [feature]/[vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

OEMs and other entities filling out this guidance area should briefly describe in a few paragraphs how the feature/or vehicle described in this letter is protecting consumer privacy. OEMs should discuss the use or disuse of the White House Consumer Bill of Rights, FTC privacy guidance, the Alliance and Global privacy principals, or other applicable industry privacy standards.

The privacy discussion should also focus on the applicability or lack thereof regarding the 7 privacy principals laid out in the guidance document (transparency, choice, respect for context, minimization/de-identification/retention, data security, integrity and access, and accountability).

OEMs should explain why their system is inconsistent or why the guidance area is not applicable should they select either checkmark.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: System Safety

Company Assessment:

	Development effort for this [feature]/[vehicle] is consistent with the guidance in this area
	Development effort for this [feature]/[vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

OEMs and other entities should describe, in a few paragraphs, their systems engineering process and functional safety approach for the feature/vehicle described in this letter. OEMs should describe what industry consensus standards (ISO/SAE/IEEE, etc.), other industries' standards (space/aviation/military, etc.), applicable NHTSA standards and guidance documents (See the June 2016 report, "Assessment of Safety Standards for Automotive Electronic Control Systems").

Submitters of this letter should describe how their feature/vehicle is addressing or superseding the guidance, or why the guidance is inconsistent with the feature/vehicle described in this letter, or why the guidance area is not applicable.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Vehicle Cybersecurity

Company Assessment:

	Development effort for this [feature] / [vehicle] is consistent with the guidance in this area
	Development effort for this [feature] / [vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Entities submitting a letter for a feature/vehicle should describe in a few paragraphs how their system is following the cybersecurity guidance described in the Federal automated Vehicle Policy. OEMs should describe their use of voluntary industry consensus standards (IEEE, SAE, ISO), and design principle guidance and best practices (NIST, NHTSA, the Alliance of Automobile Manufacturers, and the Association of Global Automakers).

Submitting OEMs and other entities should describe how their work with AUTO-ISAC or other industry vulnerability sharing groups impacts the design process of the vehicle/feature described in this letter. Should an entity choose to not interact with the AUTO-ISAC or a similar industry group, an explanation as to how they are internally dealing with these same topics should be described here.

Submitting entities that determine the guidance area is not applicable to their described feature/vehicle or feel that their feature/vehicle is inconsistent with the guidance laid out in this area should provide a brief explanation as to why.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Human Machine Interface

Company Assessment:

	Development effort for this [feature]/[vehicle] is consistent with the guidance in this area
	Development effort for this [feature]/[vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Submitting OEMs and other entities should describe in a few paragraphs how their Vehicle/feature's HMI design follows the guidance contained in the Federal Automated Vehicle Policy.

Submitting entities that determine the guidance area is not applicable to their described feature/vehicle or feel that their feature/vehicle is inconsistent with the guidance laid out in this area should provide a brief explanation as to why

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Crashworthiness

Company Assessment:

	Development effort for this [feature] / [vehicle] is consistent with the guidance in this area
	Development effort for this [feature] / [vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Submitting OEMs and other entities should briefly describe in a few paragraphs how their vehicle/feature that is the focus of this letter on how the vehicle approaches safety from a crashworthiness standpoint. For full vehicles with non-standard, submitters should describe how the automated feature or new design impacts the safety functionality of the occupant protection systems, and how the feature provides an equivalent or higher level of safety to current FMVSSs.

Submitters should also describe how their vehicle or feature impacts the crash compatibility with existing vehicles on the road as well as with pedestrians and other non-vehicle objects. Submitters for whom the guidance is either not applicable or their vehicle/feature is inconsistent with this guidance area should describe briefly why.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Consumer Education and Training

Company Assessment:

	Development effort for this [feature]/[vehicle] is consistent with the guidance in this area
	Development effort for this [feature]/[vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Submitting OEMs and other entities should describe in a few paragraphs their efforts to educate and train the consumers who are using the vehicle/feature described in this letter. This may include dealer outreach and training, tutorials based onboard the vehicle, web or online based training, or other media based training. Submitting entities should provide the agency and the public with an understanding of how knowledge about the use of these systems can be obtained.

OEMs and other entities who are submitting letters for which their feature/vehicle is not consistent with the guidance or for whom the guidance is not applicable should explain why in this section as well.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Registration and Certification

Company Assessment:

	Development effort for this [feature] / [vehicle] is consistent with the guidance in this area
	Development effort for this [feature] / [vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Manufactures and other entities submitting a safety assessment letter should describe how they are meeting the registration and certification guidelines outlined in federal automated vehicle policy. This should include discussion on how the owner/operator is alerted to new features and changes in automated level functionality, as well as describing the base SAE J3016 level to the driver.

Submitting entities that determine the guidance area is not applicable to their described feature/vehicle or feel that their feature/vehicle is inconsistent with the guidance laid out in this area should provide a brief explanation as to why.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Post Crash Behavior

Company Assessment:

	Development effort for this [feature]/[vehicle] is consistent with the guidance in this area
	Development effort for this [feature]/[vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Submitting manufacturers and other entities should briefly describe in a few paragraphs how the vehicle/feature responds post-crash or after critical sensor systems become damaged, inoperable, or are malfunctioning.

Submitters for whom the guidance is either not applicable or their vehicle/feature is inconsistent with this guidance area should describe briefly why.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Federal, State, and Local Laws

Company Assessment:

	Development effort for this [feature] / [vehicle] is consistent with the guidance in this area
	Development effort for this [feature] / [vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Submitting OEMs and other entities should briefly describe in a few paragraphs how the feature/vehicle will comply with, and follow, all applicable Federal, State, and local laws. This submission description should include a discussion of how this process is updated as new laws and requirements are signed enacted on the local, State, and federal level.

The guidance contained in the Federal Automated Vehicle Policy also discusses the ability to violate certain motor vehicle laws in safety-critical situations. Submitting entities should briefly discuss how the vehicle/feature complies with this aspect of the guidance.

Submitting entities that determine the guidance area is not applicable to their described feature/vehicle or feel that their feature/vehicle is inconsistent with the guidance laid out in this area should provide a brief explanation as to why.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Ethical Considerations

Company Assessment:

	Development effort for this [feature] / [vehicle] is consistent with the guidance in this area
	Development effort for this [feature] / [vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Manufacturers and other entities who are submitting a safety assessment letter should briefly describe in a few paragraphs how the vehicle/feature that is described in this letter is following the ethical considerations described as part of the Federal Automated Driving Policy.

Submitting entities that determine the guidance area is not applicable to their described feature/vehicle or feel that their feature/vehicle is inconsistent with the guidance laid out in this area should provide a brief explanation as to why.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Operational Design Domain (ODD)

Company Assessment:

	Development effort for this [feature] / [vehicle] is consistent with the guidance in this area
	Development effort for this [feature] / [vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

The manufacture or other entity submitting the assessment letter should use this area to briefly describe in a few paragraphs the expected operational design domain of the vehicle/feature described in this letter. This description should include a discussion of not only the SAE J3016 level of the vehicle/feature as well as

Roadway types on which the HAV system is intended to operate safely, Geographic area, Speed range, Environmental conditions in which the HAV will operate (weather, daytime/nighttime, etc.), and Other domain constraints.

Submitting entities that determine the guidance area is not applicable to their described feature/vehicle or feel that their feature/vehicle is inconsistent with the guidance laid out in this area should provide a brief explanation as to why.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Object Event Detection and Response (OEDR)

Company Assessment:

	Development effort for this [feature]/[vehicle] is consistent with the guidance in this area
	Development effort for this [feature]/[vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Submitting manufacturers and other entities should provide a brief description in a few paragraphs here of the object event detection and response for the vehicle/feature described in this letter. This should be a description of the behavioral competencies that the feature/vehicle is capable of responding to during both normal driving conditions (such as “Detect and Respond to Speed Limit Changes and Speed Advisories”), as well as a description of the crash avoidance behavior, including descriptions of pre-crash scenarios and hazards that the described feature/vehicle is capable of responding to.

Submitting entities that determine the guidance area is not applicable to their described feature/vehicle or feel that their feature/vehicle is inconsistent with the guidance laid out in this area should provide a brief explanation as to why.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Fall Back (Minimal Risk Condition)

Company Assessment:

	Development effort for this [feature]/[vehicle] is consistent with the guidance in this area
	Development effort for this [feature]/[vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Manufacturers and other entities submitting a safety assessment letter should use this section to briefly describe in a few paragraphs how the vehicle falls back to a minimal risk condition, whatever that condition may be, in the event that a system failure or other major event necessitates it for the vehicle/feature that is the subject of this letter. Submitting parties should also discuss how that fallback occurs, where it can happen, and how the fallback mechanism can be tested.

Submitting entities that determine the guidance area is not applicable to their described feature/vehicle or feel that their feature/vehicle is inconsistent with the guidance laid out in this area, should provide a brief explanation as to why

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.

Guidance Area: Validation Methods

Company Assessment:

	Development effort for this [feature] / [vehicle] is consistent with the guidance in this area
	Development effort for this [feature] / [vehicle] is inconsistent with the guidance in this area
	This guidance area of the Federal Automated Vehicle Policy is not applicable to this development effort

General Discussion

Submitting manufacturers and other entities should describe briefly in a few paragraphs the various methods used to validate the vehicle/feature that comprises this letter. This description should include a discussion of the behavioral competencies tested, as well as discussion of the fall back strategies performance.

Submitting entities that determine the guidance area is not applicable to their described feature/vehicle or feel that their feature/vehicle is inconsistent with the guidance laid out in this area should provide a brief explanation as to why.

Supporting information

OEMs and other entities should add any supplemental documentation, supporting research, here as needed. Any confidential business information should be submitted as a separate appendix to this letter.