

DAIMLER TRUCK

North America

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National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave. SE
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Re: Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors (NHTSA-2025-0021)

Daimler Truck North America (“DTNA”) submits the following comments in response to the Agency Information Collection Activities, Notice and Request for Comment (“RFC”) on “Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors,” that was issued by the National Highway Traffic Safety Administration (“NHTSA”) on May 16, 2025.¹ DTNA appreciates NHTSA’s continued interest in camera monitoring systems (“CMS”), which represent an opportunity to replace rear view mirrors with cameras to enhance vehicle safety and are a technology that has already seen significant adoption elsewhere in the world.² Given the promise of this technology, DTNA urges NHTSA to move beyond this data collection and push forward with rulemaking, interpretations, or other regulatory actions to allow for the wider deployment of CMS on commercial motor vehicles (“CMVs”) and other heavy-duty vehicles, to ensure the safety and technological leadership of America’s transportation system.

Headquartered in Portland, Oregon, DTNA is the largest original equipment manufacturer of medium- and heavy-duty vehicles in the United States. Whether it’s hauling freight, transporting people, or building and maintaining critical infrastructure, our truck and bus brands, including Freightliner, Western Star, Thomas Built Buses, Freightliner Custom Chassis, and Detroit Diesel, are trusted by the nation’s fleets as leaders in technological innovation and safety. With U.S. origins established over 80 years ago, DTNA proudly employs almost 20,000 people in America, working in nine manufacturing plants, 11 parts distribution centers, and numerous satellite locations. Our vision and actions strive to serve those that keep our world moving, and we are proud to lead safety, automation, and technological innovation at the “speed of right.” The “speed of right” is about delivering the right technologies at the right time, and in the right way.

At present, Federal Motor Vehicle Safety Standard No. 111 requires heavy-duty vehicles, including CMVs, to be equipped with outside glass mirrors,³ without including alternatives, such as CMS or other sensor

¹ Agency Information Collection Activities; Notice and Request for Comment; Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors, 90 Fed. Reg. 21109 (May 16, 2025) [hereinafter *NHTSA RFC*].

² See e.g., Mercedes-Benz, *Mirror Replacement System Hits Roadways in Europe*, OEM OFF-HIGHWAY (Dec. 16, 2019), <https://www.oemoffhighway.com/operator-cab/camera-systems/press-release/21106417/mercedesbenz-mirror-replacement-system-hits-roadways-in-europe>.

³ See 49 C.F.R. § 571.111.

technologies. Furthermore, as NHTSA notes in the RFC, a rulemaking on using cameras as mirrors has been pending since 2019,⁴ but is currently stalled at the ANPRM stage.⁵ Conversely, the Federal Motor Carrier Safety Administration (“FMCSA”) has already issued exemptions from existing requirements to allow for the use of CMS,⁶ while the Federal Highway Administration has also issued a notice of enforcement discretion to effectively extend existing vehicle width limit exemptions to CMS equipment.⁷ NHTSA should build on that progress by issuing further interpretations, exemptions, or regulatory adjustments to FMVSS No. 111 to fully support the use of CMS technologies on CMVs and other heavy-duty vehicles, up to and including modifications to the regulation that would allow CMS to replace a vehicle’s side mirrors.

By issuing exemptions for CMS technologies FMCSA has already indicated the technology’s utility as a safety technology, and DTNA’s discussions with customers indicates that drivers appreciate the wider field of view and improved visibility during low light and inclement weather conditions that the systems can offer. By taking action to further support the deployment of CMS technologies, NHTSA can help bring those benefits to CMV operators across America and put an innovative safety technology on to the road in greater numbers.

DTNA appreciates this occasion to provide our comments and we trust that NHTSA will take into consideration the suggestions and feedback that we have presented above. As the leading manufacturer of CMVs in the nation, DTNA has a strong interest in ensuring the adoption of proven safety technologies and that regulators like NHTSA develop and maintain regulations and policies that achieve the safest roads possible while promoting global American innovation and leadership. Updating existing regulations to allow for wider use of CMS technologies is also in keeping with the U.S. Department of Transportation’s ongoing push to respond to industry needs and streamline existing regulations that present unnecessary burdens and costs to industry and hold back technological advancement.⁸ Please do not hesitate to reach out with any questions or concerns as we share the same mission of supporting innovation while continuously improving road safety in the United States.

Sincerely,



Ritchie W. Huang
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Product Integrity

⁴ NHTSA RFC at 21110.

⁵ See Federal Motor Vehicle Safety Standard No. 111, Rear Visibility (NHTSA-2018-0021), 49 CFR Part 571 (October 10, 2019), <https://www.federalregister.gov/documents/2019/10/10/2019-22036/federal-motor-vehicle-safety-standard-no-111-rear-visibility>.

⁶ See Parts and Accessories Necessary for Safe Operation; Exemption Renewal for Stoneridge, Inc., 49 Fed. Reg. 7437 (Feb. 2, 2024).

⁷ Fed. Highway Admin., Notice of Enforcement Discretion, Temporary Exclusion from Truck Length and Width Limitations Camera Monitoring Systems (Jan. 8, 2021), <https://ops.fhwa.dot.gov/freight/sw/pdf/EnforcementDiscretion.CMS.010821.pdf>.

⁸ See Ensuring Lawful Regulation; Reducing Regulation and Controlling Regulatory Costs, 90 Fed. Reg. 14593 (Apr. 3, 2025).