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## Comment from Raymond Biscocho Duculan Sr.

Posted by the **National Highway Traffic Safety Administration** on Apr 27, 2026

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Comment

Subject: Technical Comment on Incident Reporting for Level 2 ADAS and ADS - High-Impact Mechanical Fail-Safes

Comment Body:

I am submitting this technical comment to highlight a critical gap in the current incident reporting framework for Level 2 ADAS and Automated Driving Systems (ADS).

While current reporting focuses on the cause of incidents, there is insufficient data collection regarding post-crash occupant extraction in high-impact scenarios ( $\geq 35G$ ) and above). In severe collisions where electronic systems (including electronic door latches and high-voltage batteries) are compromised or intentionally disconnected for fire safety, occupants are frequently trapped due to the lack of a standardized mechanical override.

As the inventor of the Active Mechanical Extraction System (AMES), my research into high-impact diagnostic data suggests that:

1. Electronic Failure is Certain at High-G: Systems relying on ADAS sensors and electronic actuators often lose structural or electrical integrity during  $\geq 35G$  impacts.
2. Reporting Requirement: NHTSA should require manufacturers to report the "Status of Occupant Extraction" (Manual vs. Tool-Assisted) for all reportable incidents.
3. Mandatory Mechanical Standards: Reporting alone is insufficient without a requirement for a mechanical extraction fail-safe that operates independently of the vehicle's primary electrical architecture.

I urge the NHTSA to consider mandating a mechanical extraction force standard (specifically targeting the  $\geq 50,000$  Newton threshold) to ensure that even when the most advanced ADAS fails to prevent a crash, the vehicle does not become a sealed environment for the occupants.

Respectfully submitted,

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