



515 KING STREET, ALEXANDRIA VA 22314

MEMORANDUM

**To: Hon. Sean Duffy, Secretary, US Department of Transportation
Hon. Jonathan Morrison, Administrator, National Highway Traffic Safety
Administration**

**From: Andrew Langer, Director, Center for Regulatory Freedom, CPAC
Foundation**

Date: April 12, 2026

**Re: US Department of Transportation National Highway Traffic Safety
Administration Information Collection Request, “Proposals, Submissions,
and Approvals: Distraction: Modern Voice Command Interfaces,” Docket
#NHTSA-2025-0059, Fed. Reg. 2026-02598, Published February 10, 2026**

Below are comments of the American Conservative Union Foundation's (d/b/a. Conservative Political Action Coalition Foundation) (hereinafter “CPAC Foundation”) Center for Regulatory Freedom (hereinafter “CRF”), in response to the US Department of Transportation National Highway Traffic Safety Administration Information Collection Request, “Proposals, Submissions, and Approvals: Distraction: Modern Voice Command Interfaces,” Docket #NHTSA-2025-0059, Fed. Reg. 2026-02598, published February 10, 2026 .

CRF is a project of the CPAC Foundation, a non-profit, non-partisan 501(c)(3) research and education foundation. Our mission is to inject a common-sense perspective into the regulatory process, to ensure that the risks and costs of regulations are fully based on sound scientific and economic evidence, and to ensure that the voices, interests, and freedoms of Americans, and especially of small businesses, are fully represented in the regulatory process and debates. Finally, we work to ensure that regulatory proposals address real problems, that the proposals serve to ameliorate those problems, and, perhaps most importantly, that those proposals do not, in fact, make public policy problems worse.

The Center for Regulatory Freedom (“CRF”) appreciates the opportunity to comment on the National Highway Traffic Safety Administration’s (“NHTSA”) proposed information collection regarding “Distraction: Modern Voice Command Interfaces.” CRF supports efforts to strengthen the empirical foundation for understanding how emerging in-vehicle technologies affect driver

behavior, cognitive workload, and roadway safety. As vehicle systems continue to evolve—particularly at the intersection of human-machine interaction and software-driven functionality—carefully designed research can play a constructive role in informing future policy development.

At the same time, the structure, scope, and intended use of such research warrant careful attention. Information collections conducted under the Paperwork Reduction Act (“PRA”) framework are not merely technical exercises; they form part of the analytical foundation upon which future regulatory decisions may be built. It is therefore essential that these efforts remain disciplined, proportionate, and analytically rigorous, ensuring that the information gathered is both decision-relevant and appropriately bounded in its interpretation.

CRF has consistently emphasized in prior submissions to the Department of Transportation that regulatory frameworks governing emerging vehicle technologies should remain performance-based, technology-neutral, and adaptable to evolving evidence. Those same principles apply at the research stage. The design of this study—and the way its findings are ultimately interpreted—will influence whether future policy enhances safety while preserving innovation, or instead risks overgeneralization and premature regulatory hardening.

Executive Summary

The Center for Regulatory Freedom supports NHTSA’s effort to better understand the safety implications of modern voice command interfaces and recognizes the value of empirical research in informing future policy decisions. However, such research must be designed and interpreted with careful attention to analytical discipline, real-world applicability, and the limits of inference.

CRF’s principal positions are summarized as follows:

- **Support continued research into driver interaction with emerging vehicle technologies, including voice command interfaces, as a means of improving safety outcomes.**
- **Ensure burden-to-utility discipline in data collection by aligning all metrics with clearly defined, decision-relevant safety questions and avoiding unnecessary or low-value data accumulation.**
- **Recognize the limitations of simulator-based research and avoid overgeneralizing findings derived from controlled environments to real-world driving conditions.**
- **Interpret proxy measures of distraction and cognitive workload with caution, particularly where the relationship between such measures and actual safety outcomes remains uncertain.**
- **Evaluate voice interfaces within a comparative framework that accounts for tradeoffs between cognitive distraction and reductions in visual-manual interaction.**
- **Avoid reliance on single-method or single-metric conclusions; situate findings within a broader, multi-source evidentiary framework that includes real-world data.**
- **Establish clear guardrails to ensure that research findings are not used to justify prescriptive design mandates, technology-specific requirements, or de facto performance thresholds.**

- **Preserve a performance-based, technology-neutral approach to any future guidance, allowing for continued innovation and system diversity.**
 - **Ensure that early-stage research does not lead to premature regulatory hardening or the adoption of rigid assumptions that may quickly become outdated.**
 - **Maintain flexibility in future policymaking by recognizing the evolving nature of both technology and the empirical evidence base.**
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Empirical research should inform regulatory policy, but it should not outpace the maturity of the underlying evidence base. In domains characterized by rapid technological change, there is a meaningful risk that early-stage findings—particularly those derived from controlled environments—may be treated as sufficiently definitive to justify prescriptive interventions. Such sequencing can constrain innovation and embed assumptions that may not hold under real-world conditions.

The proposed study reflects an effort to evaluate the effects of modern voice command interfaces on driver distraction and cognitive workload. This is an important and complex question. However, the relationship between cognitive workload metrics and actual safety outcomes remains an area of ongoing research. Accordingly, findings from this effort should be understood as contributing to an evolving body of knowledge rather than as establishing conclusive or regulatory-grade benchmarks.

The PRA framework appropriately emphasizes the need to ensure that information collections are necessary, useful, and minimally burdensome. In this context, CRF encourages NHTSA to maintain strict discipline in aligning each element of data collection with clearly defined analytical objectives. Where multiple metrics are collected—including eye-tracking data, physiological indicators, and task-based performance measures—it is important to articulate how each contributes to understanding real-world safety outcomes.

Overly expansive data collection can impose unnecessary burden without improving analytical clarity. It can also create a false sense of precision that exceeds the reliability of the underlying measures. CRF therefore encourages NHTSA to ensure that the scope of the study remains tightly focused on variables that are demonstrably linked to meaningful safety insights, rather than assembling a broad array of indicators whose interpretive value may be uncertain.

A central consideration in evaluating this proposed study is the extent to which findings derived from a driving simulator environment can be generalized to real-world driving conditions. While simulation provides valuable control and repeatability, it cannot fully replicate the dynamic, heterogeneous, and often unpredictable nature of real-world driving environments. Factors such as ambient noise, connectivity variability, system latency, and user familiarity all play a significant role in shaping real-world outcomes.

Voice command interfaces are particularly sensitive to these contextual variables. System performance may vary significantly depending on microphone configuration, background noise, speech recognition accuracy, and integration with external devices or applications. These sources of variability may not be fully captured in a controlled study environment, limiting the external validity of the findings.

CRF therefore encourages NHTSA to clearly acknowledge these limitations and to situate the results of this study within a broader evidentiary framework. Future policy considerations should incorporate insights from real-world deployment data, field studies, and longitudinal performance analysis to ensure that conclusions reflect actual operating conditions rather than controlled approximations.

The proposed study relies on a range of proxy measures—including eye-tracking metrics, heart rate variability, and response time indicators—to assess distraction and cognitive workload. While these measures can provide useful insights, their relationship to actual safety outcomes is not always straightforward. Elevated cognitive workload, for example, does not necessarily translate directly into increased crash risk, particularly where it substitutes for more hazardous behaviors such as manual device interaction.

It is therefore important that these measures be interpreted with appropriate caution. CRF encourages NHTSA to avoid overreliance on any single metric or class of metrics as a definitive indicator of safety. Instead, findings should be evaluated in a comparative framework that considers tradeoffs between different forms of distraction, including the potential for voice interfaces to reduce visual-manual interaction even as they introduce different cognitive demands.

Given the exploratory nature of this research, CRF emphasizes the importance of establishing clear guardrails around how the resulting data are used in future policymaking. Findings from this study should not be used to justify prescriptive design requirements, technology-specific mandates, or de facto performance thresholds that fail to account for system heterogeneity and ongoing technological evolution.

Regulatory frameworks should remain focused on outcomes—namely, demonstrable improvements in roadway safety—rather than on intermediate metrics or design characteristics. To the extent that this research informs future guidance, such guidance should be performance-based, flexible, and responsive to new evidence. Premature codification of specific assumptions or design preferences risks creating regulatory lock-in that may hinder innovation and limit the development of potentially safer technologies.

CRF supports NHTSA’s efforts to advance the empirical understanding of driver interaction with modern vehicle technologies. The effectiveness of this research, however, will not be determined by the volume of data collected or the sophistication of the measurement tools employed, but by whether the study is structured and interpreted in a manner that enhances real-world safety understanding while preserving the flexibility, innovation, and analytical discipline necessary in a rapidly evolving technological landscape.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew M. Langer". The signature is fluid and cursive, with the first name "Andrew" being more prominent than the last name "Langer".

Andrew M. Langer
Director
CPAC Foundation Center for Regulatory Freedom