



AUTO ALLIANCE
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March 14, 2019

Mr. Ryan Posten
Associate Administrator, Rulemaking
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Docket No. NHTSA-2019-0009; 84 Fed. Reg. 6758, February 28, 2019, FMVSS 305; Electric-Powered Vehicles: Electrolyte Spillage and Electrical Shock Protection; Notice of Proposed Rulemaking

Dear Mr. Posten:

On behalf of the members of the Alliance of Automobile Manufacturers (“Alliance”), who are BMW Group, FCA US LLC, Ford Motor Company, General Motors Company, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche Cars North America, Toyota, Volkswagen Group of America and Volvo Cars of North America, we are pleased to support the revisions to FMVSS 305 as proposed in the subject notice.

Since the proposed revisions will clarify the direct contact protection requirements that apply to high voltage connectors, and explicitly permit the use of high voltage connectors that cannot be separated without the use of tools as well as harmonize FMVSS No. 305 with Global Technical Regulations (GTRs) No. 13 and No. 20, which explicitly permit such connectors, the Alliance urges the agency to implement the proposed revisions as expeditiously as possible.

In our November 13, 2017, petition we noted that many of the requirements in the subject final rule involve new and/or complicated test procedures/measurement techniques and recommended that NHTSA host a public compliance workshop.

Alliance members have found past compliance workshops to be immensely helpful and thus would like to reiterate our request that the Agency host one for this important revision of FMVSS 305.

Sincerely,

Scott Schmidt
Senior Director, Safety & Regulatory Affairs
Alliance of Automobile Manufacturers

Alliance of Automobile Manufacturers

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