



May 17, 2021

The Honorable Frank Pallone
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Cathy McMorris Rodgers
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Jan Schakowsky
Chairman
Subcommittee on Consumer Protection and
Commerce
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Gus Bilirakis
Ranking Member
Subcommittee on Consumer Protection and
Commerce
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Pallone, Ranking Member Rodgers, Chairman Schakowsky, and Ranking Member Bilirakis:

The Motor & Equipment Manufacturers Association (MEMA) represents more than 1,000 vehicle suppliers that develop innovative technologies and manufacture and remanufacture original equipment (OE) and aftermarket components and systems for use in passenger cars and commercial trucks.¹ This industry operates in all 50 states, directly employs almost one million Americans, and is the largest sector of manufacturing jobs in the United States.² On behalf of this industry, I respectfully submit this letter to you for the record for the Consumer Protection and Commerce Subcommittee's hearing titled "Promises and Perils: The Potential of Automobile Technologies."

Across the entire range of new vehicle innovation – from automated to zero-emission technologies – vehicle suppliers are leading the way. Vehicle suppliers conceive, design, and manufacture the OE components and technologies that make up more than 77 percent of the value in new vehicles. Vehicle suppliers also manufacture aftermarket parts and materials for the maintenance and repair of over 290 million vehicles on the road.

MEMA supports infrastructure legislation that accelerates the development, commercialization, manufacture, and deployment of new, advanced technologies in the United States.³ This includes the more rapid deployment of the critical building-block technologies needed to reach the targets for electrified and automated vehicles. The promotion of technology development will allow the U.S. to be more innovative and globally competitive and to lead the world on the path of enhanced mobility for all citizens.

¹ MEMA represents its member companies through its four divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); MERA - The Association for Sustainable Manufacturing; and Original Equipment Suppliers Association (OESA).

² [U.S. Labor and Economic Impact of Vehicle Supplier Industry](#), MEMA and IHS Markit. February 2021.

³ MEMA will provide this committee with additional views on the commercial vehicles and freight transportation.



MEMA members have long led in developing innovative vehicle technologies that save lives, improve efficiencies, and reduce emissions. We believe infrastructure legislation must be part of an overall comprehensive, strategic, and meaningful plan to prepare the U.S. for a technologically advanced transportation future. For too long, the U.S. has not moved forward at an adequate pace to accommodate and prepare our nation for these advanced technologies in a concerted, dedicated, and clear fashion.

The vehicle industry has long product cycles; suppliers must plan for components and systems ahead of the curve and well in advance of deployment. Vehicle suppliers and our vehicle manufacturer customers are being encouraged by policymakers to design, develop, and deploy these technologies in the U.S. Meeting these goals will require a more substantive framework within which the industry can innovate and create jobs. While there is an array of guidelines, best practices, voluntary agreements, and incomplete or shelved rulemakings, a more structured, coordinated policy framework is critical to abating the uncertainty that persists in the U.S. There are other regions in the world that are rapidly closing these gaps. A structured roadmap is needed to keep our country on the leading edge as a manufacturing and innovation center and to provide Americans with greater mobility, safety, and environmental benefits.

Congress and the Administration must focus on advanced technology readiness and competitiveness. To meet this goal, the U.S. must provide a policy framework for our manufacturers to compete globally for technology development and deployment. Our country has a strong foundation to be the global leader in creating new innovative, forward-leaning technology, including automated and electric vehicles. This leadership will require significant investments and incentives with an established roadmap.

One of the tools that MEMA urges the Committee to consider is a substantive update of the U.S. New Car Assessment Program (NCAP). The timeline to update the program can be done in a relatively short period while encouraging deployment and providing consumers with more comparable information, particularly about the benefits of crash avoidance technologies. Updating NCAP will help the U.S. keep pace with other global regions in technological advancements.

The U.S. NCAP is a voluntary program providing consumers with information regarding the performance and equipment in new vehicles. The current program only rates a vehicle's crashworthiness – in other words, how well it protects the vehicle's occupants in a crash. It does not include any ratings for crash avoidance technologies. The U.S. NCAP is not keeping up with technology development or its global counterparts and is not serving the American consumer well. It must be updated.

MEMA urges Congress to specifically direct NHTSA to update and modernize the NCAP. MEMA supported language in the FAST Act in 2015 that required NHTSA to include crash avoidance technology information on the Monroney Label. Although NHTSA has a substantial amount of data on the efficacy of these technologies, the agency never finalized the congressional mandate. However, the 2015 FAST Act requirement is no longer sufficient to ensure that a consumer has enough information about crash avoidance technologies.

Instead, Congress should take additional steps to require NHTSA to plan for a substantive and comprehensive update of the NCAP. NHTSA should immediately update the NCAP by adding a list of pre-determined crash avoidance and mitigation technologies that will be considered when determining the rating of a specific vehicle. Regarding crash avoidance, several technologies are ripe for immediate inclusion and address common crash scenarios. Much of the technical work, research, and test procedures have already been completed for many of these currently available

technologies. As such, there are several that can be immediately included as part of an initial update to the NCAP.

Therefore, NHTSA should be required to move forward quickly and finalize these new requirements without further delay. Equally important, NHTSA must establish a clear roadmap to allow for phased-in future updates by prescribed milestones, providing vital time and certainty needed for product development and planning of vehicle manufacturers and suppliers. These changes will assure that NCAP keeps pace with new technologies and, more importantly, keep the U.S. on the leading edge of safety technology innovation.

MEMA recognizes that the language in the Moving Forward Act (H.R. 2) in the 116th Congress attempted to address some of the shortcomings in the current NCAP. MEMA appreciated the inclusion of a roadmap and the requirement to include crash avoidance technologies in the rating system. While MEMA raised concerns about some of the specific provisions in the NCAP section, we applaud the Committee's interest in and attention to updating the program. We welcome the opportunity to provide stakeholder input on legislation this Congress.

MEMA encourages the Committee to remember that NCAP is only one part of a policy framework that suppliers rely on for technology deployment. Other provisions, such as parity with vehicle manufacturers for testing technology and comprehensive automated vehicle policy, must also be considered and enacted.

In conclusion, the supplier industry is in a transformative moment that can provide greater mobility, safety, and environmental protection for our citizens. MEMA is committed to being a part of the ongoing discussions on all aspects of the legislation facing Congress. As these discussions continue, MEMA urges Congress to consider the industry's needs outlined above to support the supplier industry and our workforce. Our nation requires these tools for the complex vehicle supplier industry in this country to remain competitive.

For any additional information or questions, please contact Catherine Boland, vice president of legislative affairs (cboland@mema.org).

Sincerely,

A handwritten signature in black ink that reads "Ann Wilson". The signature is written in a cursive, flowing style.

Ann Wilson
Senior Vice President, Government Affairs