

October 15, 2026

Hon. Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE, Washington, DC 20590

Re: New Car Assessment Program: Removal of Dynamic Rollover Resistance Test and Side Air Bag Out-of-Position Testing; Updates to NCAP's 10-Year Roadmap [Docket No. [NHTSA-2026-1651](#)]

Dear Administrator Morrison:

The Intelligent Transportation Society of America (ITS America) appreciates the opportunity to provide public comment on the updates to the New Car Assessment Program's (NCAP) 10-Year Roadmap as published by the National Highway Traffic Safety Administration's (NHTSA).

ITS America is the only national organization bringing together the private, public, and research sectors in intelligent transportation, convening experts across the industry who are fostering innovation to improve safety and efficiency in our transportation system. Our member organizations include state, regional, and local transportation and planning agencies, transit providers, major technology firms, auto manufacturers and suppliers, companies providing intelligent transportation systems (ITS) products and services, data companies, research organizations, and academic institutions, all centered around delivering efficient, effective technology-forward transportation solutions.

ITS America commends NHTSA for its updates to the Roadmap, including the presence of safety-enhancing and crash prevention technologies such as automatic emergency braking (AEB) and other Advanced Driver Assistance Systems (ADAS) technologies. Research on and eventual implementation of these technologies into NCAP and new vehicles will improve safety for all road users.

After reviewing the recent update to the Roadmap, ITS America is concerned that Vehicle-to-Everything (V2X) communication technologies are not more prominently reflected among the safety technologies and strategies under consideration. This includes “direct” V2X within the 5.9 GHz spectrum band and “networked” V2X digital alerting which relies on cellular communications. As NHTSA continues to advance its vision for reducing roadway fatalities and serious injuries, V2X offers a unique capability to address crash scenarios that traditional onboard technologies alone may not be able to detect, including hazards beyond line of sight, around corners, or through adverse weather conditions, along with digital alerting capabilities for hazardous road conditions, disabled vehicles, emergency responders nearby, and traffic queues.

We encourage NHTSA to more thoroughly evaluate the safety benefits of both direct and networked V2X technologies and consider how these capabilities can complement other vehicle safety systems highlighted throughout the Roadmap. A robust research agenda examining the role of V2X in preventing crashes, improving situational awareness, and supporting broader vehicle safety objectives would help ensure the agency fully assesses all promising technologies available to achieve its safety goals. As NCAP continues to evolve, ITS America believes direct and networked V2X merit serious consideration as part of the suite of safety innovations that can enhance vehicle performance and deliver meaningful safety benefits to the traveling public.

V2X technologies enable vehicles and infrastructure to exchange messages wirelessly and very quickly with other vehicles, roadside infrastructure, and vulnerable road users – like bicyclists and pedestrians. Sharing key information between the various parties in the transportation network allows responses that can improve safety, prevent crashes, optimize system performance, and reduce congestion. Specifically, NHTSA has already estimated that these technologies have the potential to eliminate or mitigate up to 80% of non-impaired crashes.¹

The National Transportation Safety Board (NTSB) has long recognized the impact these technologies could have if deployed in vehicles at scale, having first identified the potential of V2X to save lives in 1995.² NTSB first recommended in 2013 that NHTSA require V2X in new vehicles after identifying additional fatal crashes that could have been prevented by these technologies and has continued to call for the technology's inclusion in new vehicles.³

ITS America encourages NHTSA to more fully evaluate the potential safety benefits of V2X technologies and to undertake the research necessary to assess their effectiveness, feasibility, and role in advancing the agency's vehicle safety objectives. NHTSA could incorporate functions, services, and applications into NCAP that can be achieved or delivered through direct and networked V2X, such as digital alerting, to better signal support to automakers for V2X deployment in vehicles.

ITS America is not recommending a mandate for V2X technology in new vehicles. Rather, we encourage NHTSA to initiate additional research and data collection to better understand the effectiveness, feasibility, and potential safety benefits of V2X applications. Given the current deployments of networked V2X solutions, such as digital alerting in fleets and personally owned vehicles, inclusion of V2X in NCAP can further serve as an incentive for greater adoption and would recognize the already strong commercial success of networked solutions. Several international vehicle safety assessment programs, including Euro NCAP, have already begun incorporating consideration of connected vehicle technologies into their safety frameworks. NHTSA should ensure that V2X receives thorough evaluation as part of its broader effort to identify and encourage emerging safety technologies with the potential to reduce crashes and save lives.

Recognition within NCAP's rating system represents one of the strongest tools available to encourage safety technology deployment in vehicles at scale, further establishing consumer awareness about the safety benefits of V2X or other safety technologies, and bolstering the business case for V2X adoption.

¹ NHTSA NPRM on V2V Communications, 2016. [Docket No. NHTSA-2016-0126]

² Multiple Vehicle Collision With Fire During Fog Near Milepost 118 on Interstate 40, Menifee, Arkansas, January 9, 1995, and Special Investigation of Collision Warning Technology. <https://www.nts.gov/investigations/AccidentReports/Reports/HAR9503.pdf>

³ NTSB Safety Recommendation H-13-031 <https://data.nts.gov/carol-main-public/sr-details/H-13-031>

ITS America would also recommend that NCAP roadmaps be updated on a more regular basis to keep pace with changes in technology and vehicle safety features being offered on the market today, both in the U.S. and abroad. Vehicle technologies are evolving and advancing quickly, and it is critical that NHTSA modernize the NCAP process to address and accelerate new safety technologies.

If you have any questions, please reach out to Jim Broderick, Director of Policy and Government Affairs (jbroderick@itsa.org).



Laura D. Chace
President & CEO
ITS America