



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

May 7, 2026

Dockets Operations

U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor
Washington, DC 20590-0001

RE: Docket Number: FMCSA-2026-0100

Parts and Accessories Necessary for Safe Operation; Application for an Exemption From Grote Industries, LLC

The Commercial Vehicle Safety Alliance (CVSA), respectfully submits the following comments in response to the Federal Motor Carrier Safety Administration's (FMCSA) request for feedback regarding the application from Grote Industries, LLC (Grote) for an exemption from the requirement that exterior lighting devices on commercial motor vehicles (CMVs) be steady-burning. Specifically, the exemption would allow motor carriers to operate CMVs equipped with auxiliary rear or side lamps that flash or strobe when controlled by Grote's Rear-End Collision Warning (RCW) system, docket number FMCSA-2026-0100.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle (CMV) safety officials and industry representatives. The Alliance aims to prevent commercial motor vehicle crashes, injuries and fatalities and believes that collaboration between government and industry improves road safety and saves lives. Our mission is to improve commercial motor vehicle safety and enforcement by providing guidance, education and advocacy for enforcement and industry across North America.

CVSA and its members appreciate the opportunity to provide feedback on the exemption request from Grote to deploy new technology aimed at improving roadway safety by alerting drivers to potential collision risk. CVSA has a long-standing history of robust support for deployment of safety technologies that have been proven through independent research and testing to reduce or mitigate the severity of collisions involving CMVs. CVSA would like to thank the agency for granting the Alliance's request for an extension of the comment period for this exemption request. The additional time allowed CVSA's Vehicle and Policy and Regulatory Affairs Committees to hear from representatives from Grote and discuss the technology. CVSA's committees received presentations from representatives from Grote, who explained the company's RCW system, which is designed to be implemented on the rear end of a CMV, to alert approaching vehicles behind the CMV of potential imminent collisions.

In their exemption request, Grote explains that, when the system is activated, *“the lamp(s) shall be red in color and shall flash between four (4) and sixteen (16) times in four (4) seconds with each activation of the RCW signal circuit, then steadily burn red while the signal circuit is active. Alternatively, the lamp(s) shall be amber in color and function as an SAE J595 Class 3 or Class 2 strobe lamp for up to four (4) seconds with each activation of the ROW signal circuit, then steadily burn red while the signal circuit is active.”*

Generally, CVSA’s members were encouraged by the potential safety impacts of the Grote RCW system, as it has the potential to reduce rear-end collisions caused by the trailing vehicle traveling too closely to the CMV. In particular, the fact that the system activates automatically and does not require action from or the attention of the CMV driver was well received.

However, CVSA’s member jurisdictions expressed strong concerns that the system utilizes steady burning red lamps as part of the process. Currently, red lamps that activate and remain steady on the rear of a vehicle are associated with braking. CVSA’s members were concerned that the driver in the trailing vehicle may mistakenly perceive the steady burning red lamps as a hard braking action by the CMV, causing the driver to apply their brakes reactively or respond in another unexpected manner. CVSA’s members expressed these concerns to the representatives from Grote and recommended the company reconsider the use of steady burning red lamps in the system, suggesting the use of steady burning amber lamps instead.

CVSA supports FMCSA granting the exemption to allow the agency to study the safety impacts of this new technology, *provided that* the exemption is revised to exclude the transition from flashing amber to steady burning red lamps.

CVSA works to closely monitor, evaluate, and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the agency’s consideration of our request for an extension to the comment period.

If you have further questions or comments, please do not hesitate to contact me at 202-998-1008 or collin.mooney@cvsa.org.

Respectfully,

A handwritten signature in black ink, appearing to read 'Collin B. Mooney'.

Collin B. Mooney, MPA, CAE
Executive Director
Commercial Vehicle Safety Alliance