



April 13, 2026

U.S. Department of Transportation  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590

Submitted via *regulations.gov*

**Comments of Consumer Reports to the  
National Highway Traffic Safety Administration on the  
Agency Information Collection Activities; Notice and Request for Comments:  
Drive-Mode Design Best Practices  
Docket No. NHTSA-2025-0128**

Consumer Reports (CR), the independent, nonprofit, and nonpartisan member organization,<sup>1</sup> welcomes the opportunity to provide comments on the National Highway Traffic Safety Administration's (NHTSA) proposed information collection to examine how different drive mode implementations on mobile phones affect driver attention and performance as compared to standard interfaces.

Seeking to better understand how drive mode interfaces for mobile phones operating independently of in-vehicle systems affect driver attention and performance, with the goal of supporting best practices for future drive mode applications and functionalities, is a worthwhile objective. Some drivers still interact with phones outside of integrated in-vehicle platforms, and simplifying the phone interface could contribute to reductions in distraction.

At the same time, the practical value of the study could be strengthened if it included a more direct consideration of how drivers might behave with drive mode systems. Because drive mode is designed to simplify the interface and limit functionality while driving, it is not only important to ask whether a restricted interface performs better in a controlled setting, but also whether drivers stay in that restricted mode when they encounter friction while attempting to complete phone-based tasks like messaging, navigation entry, media selection, or access to other device functions. If drivers respond by turning drive mode off, backing out of the restricted interface, or otherwise finding ways to complete the task while the vehicle is in motion, the safety value of the design may be substantially undermined. A design that instead leads drivers to

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<sup>1</sup> Founded in 1936, Consumer Reports (CR) is an independent, nonprofit, and nonpartisan organization that works with consumers to create a fair and just marketplace. Known for its rigorous testing and ratings of products, CR advocates for laws and company practices that put consumers first. CR is dedicated to amplifying the voices of consumers to promote safety, digital rights, financial fairness, and sustainability. The organization surveys millions of Americans every year, reports extensively on the challenges and opportunities for today's consumers, and provides ad-free content and tools to five million members across the United States.

stop, defer, or abandon a nonessential task would have greater practical safety value insofar as it would maintain more of the driver's attention on the driving task.

The proposed study appears well suited to examine how different drive mode interfaces affect attention and performance, but it is less clear whether it would permit a meaningful comparison of how drivers adapt when those interfaces restrict what they are trying to do. It is one thing to know whether a design looks safer while drivers are using it as intended, but it is another to know what drivers do when they hit a restriction they do not like. In particular, it would be useful for NHTSA to clarify whether the study will allow the agency to identify which drive mode restrictions are more likely to lead drivers to seek a workaround and which are more likely to lead drivers to stop or defer the task. It would also be useful to understand whether particular restriction types differ in their effects on, for instance, long off-road glances.

Consumer Reports welcomes this research into how drive mode design may influence driver attention and distraction-related behavior, and we look forward to seeing how it might help identify approaches that reduce distraction and that take into account how drivers might interact with and behave with these systems in the real-world.

Respectfully submitted,

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