



May 5, 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 Comment;  
Distraction: Personal Electronic Devices  
Docket No. NHTSA-2025-0058**

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) notice regarding the proposed research study, "Distraction: Portable electronic devices." Given that smartphone mirroring systems are now integrated across a significant portion of the vehicle fleet, understanding their impact on driver distraction is important for establishing the evidence base necessary to guide any future agency actions.

CR observes that this proposed information collection appears to overlap with another recently proposed study, "Distraction: Modern Voice Command Interfaces" (Docket No. NHTSA-2025-0059) in terms of the tasks evaluated and the performance measures used to assess cognitive workload. The primary distinction in this collection appears to be the focus on evaluating smartphone mirroring systems against NHTSA's visual-manual guidelines, utilizing an occlusion study and a closed-course track evaluation rather than emphasizing voice interaction specifically. In comments on the proposed voice command study, CR recommended ways to more effectively measure the magnitude of distraction relative to ordinary driving and stressed the importance of designing protocols that reflect real-world challenges that drivers face, such as an increased cognitive workload with failed interactions and their tendency to seek workarounds when they encounter friction with the interface.<sup>2</sup>

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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.

<sup>2</sup> Consumer Reports, "CR comments to NHTSA on proposed information collection on modern voice command interfaces" (Apr. 13, 2026) (online at: ([advocacy.consumerreports.org/wp-content/uploads/2026/04/CR-Comments-on-Modern-Voice-Commands-Research-4.13.2026.pdf](https://advocacy.consumerreports.org/wp-content/uploads/2026/04/CR-Comments-on-Modern-Voice-Commands-Research-4.13.2026.pdf))).

While evaluating these interfaces is important, CR is concerned that this study, as proposed, would mostly focus on whether these systems are simply conforming to existing NHTSA guidelines instead of exploring more important questions regarding the nature of distraction as it relates to these interfaces. Since the ultimate goal of this research presumably would be to inform and update safety guidelines, it might be more valuable to understand what specific aspects of these interfaces are actually driving distraction, and identify precisely where these systems break down for the user and how drivers might adapt to various interface designs.

It may also be worth exploring the role of more dynamic approaches to restricting or managing access to certain functions, as well as shaping how tasks are paced and completed, within the context of this research. Current guidelines rely on static thresholds, such as total eyes-off-road time, to determine whether tasks are appropriate while driving. Such static thresholds may not fully reflect how people actually behave when they drive. Drivers in real-world scenarios often self-pace their interactions or break tasks into smaller segments to manage attentional demands. Furthermore, if in-vehicle systems are perceived as too restrictive, drivers may even be incentivized to switch to their handheld phones to complete a task. Investigating behavioral nuances in how drivers respond to different types of restrictions, including more adaptive approaches, could provide the depth of data necessary to appropriately inform future safety guidelines and agency actions aimed at mitigating distraction risks.

CR appreciates NHTSA's continued work to better understand driver distraction. We look forward to insights this study and other distraction-related research may yield as the agency works toward reducing the number of deaths and injuries related to driver distraction.

Respectfully submitted,

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