



# Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

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February 24, 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 requests a 60-day extension to the comment period for 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. In the request, Grote bases much of their justification for the exemption on the performance and efficacy of forward collision warning (FCW) technology. However, the proposed technology, while based on FCW, does not operate in the same manner and the documents safety performance of that proven technology cannot simply be assumed to apply to this new application.

While CVSA has a long-standing history of robust support for deployment of safety technologies that reduce or mitigate the severity of collisions involving CMVs, that support is based on the technology being proven to improve safety through thorough research and testing. CVSA requests an extension to the comment period to allow our membership to discuss the proposed exemption request. The Alliance's 2026 Workshop is scheduled for April 19-

23 and will include meetings of our Vehicle, Policy and Regulatory Affairs, and Crash Data and Investigation Standards Committees. The workshop brings together hundreds of safety professionals from enforcement and industry to discuss topics such as this, and an extension of 60 days would allow our members to consider the exemption fully and provide thoughtful feedback to the agency.

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](mailto: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