



Tim Day
Senior Vice President
U.S. Chamber of Commerce

1615 H Street, NW
Washington, DC 20062

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Docket Operations, M-30
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue SE
Room W12-140
West Building Ground Floor
Washington, DC 20590-0001

Re: Removing Regulatory Barriers for Vehicles With Automated Driving Systems

To Whom It May Concern:

The U.S. Chamber of Commerce's Technology Engagement Center ("C_TEC") appreciates the opportunity to provide comments to the National Highway Traffic Safety Administration's ("NHTSA") in response to the above-referenced proceeding.¹ C_TEC supports NHTSA's approach in this ANPRM to reduce regulatory barriers for ADS-equipped vehicles and encourages NHTSA to continue utilizing the regulatory process to safety modernize barriers to innovation. C_TEC recommends that NHTSA look to C_TEC's "Automated Vehicle Policy Principles," (attached) for additional guidance, which outlines an industry, consensus-based approach to regulating automated vehicles.

The Opportunity of Automated Vehicles

The introduction of automated or ADS-equipped vehicles will bring substantial safety, mobility, and economic benefits to the American public. For instance, in 2017, NHTSA has estimated that 37,133 people died in motor vehicle crashes, 94% of which can be attributed to

¹ 84 Fed. Reg. 24433 (May 28, 2019) available at <https://www.govinfo.gov/content/pkg/FR-2019-05-28/pdf/2019-11032.pdf>.

human error.² The widespread deployment of ADS-equipped vehicles can dramatically reduce future traffic fatalities, and improve overall road safety. In addition, there are millions of Americans unable to drive or otherwise limited in a conventional vehicle including the elderly and persons with disabilities. The deployment of ADS-equipped vehicles will provide new opportunities for those populations as well as provide secondary benefits to the public as a whole such as reduced health care expenditures.³

Finally, the introduction of ADS-equipped vehicles will bring significant economic benefits to American workers and consumers. According to one study, autonomous vehicles are projected to add \$800 billion in cumulative economic benefits by 2050.⁴ Also, a study from Intel and Strategy Analytics estimated that autonomous vehicle technology can unlock a “Passenger Economy” with a global value of \$7 trillion by 2050.⁵ Through taking a safety-first approach to modernizing existing regulations and methods of verifying compliance, the United States can achieve these benefits and be the global leader in automated vehicles.

Suggested Approach to Modernize Compliance Verification

C_TEC applauds NHTSA’s approach in this ANPRM to consider various approaches to verifying compliance for ADS-equipped vehicles with the crash avoidance standards contained in the Federal Motor Vehicle Safety Standards (FMVSS). Novel motor vehicle designs and features will mean that some ADS-equipped vehicles may not have manual controls, and consequently will require new test procedures to verify the safety the vehicle. As developers of ADS-equipped vehicles continue to make significant advancements in ADS technology, C_TEC believes that NHTSA should use its broad rulemaking authority to reduce regulatory barriers to enable the testing of ADS-equipped vehicles and ensure regulatory compliance.

To address regulatory barriers and modernize compliance verification for crash avoidance standards, C_TEC believes that NHTSA should keep the following guidelines in mind as it balances the usefulness and agility of an ADS-equipped vehicle with a safety model that complies with the societal norms of careful driving. First, C_TEC ensuring motor vehicle safety should remain the number one priority for verifying compliance and that any new approaches for verifying compliance should not diminish safety. Second, the autonomous vehicle industry is diverse and dynamic, and consistent with AV 3.0, any new methods to verify compliance should be technology and stakeholder-neutral. Finally, to encourage innovative approaches, C_TEC supports a non-prescriptive, performance-based approach to compliance verification.

² Kevin Jost, “Saving lives is top AV prize,” *Autonomous Vehicle Technology* (Jan. 3, 2019) available at <https://www.autonomousvehicletech.com/articles/1425-saving-lives-is-top-av-prize>

³ Henry Claypool, Amitai Bin-Nun, and Jeffrey Gerlach, “Self-Driving Cars: The Impact on People with Disabilities,” Rudman Family Foundation (January 2017), available at https://rudermanfoundation.org/wp-content/uploads/2017/08/Self-Driving-Cars-The-Impact-on-People-with-Disabilities_FINAL.pdf.

⁴ America’s Workforce and the Self-Driving Future: Realizing Productivity Gains and Spurring Economic Growth, Securing America’s Energy Future (June 2018) available at https://avworkforce.secureenergy.org/wp-content/uploads/2018/06/Americas-Workforce-and-the-Self-Driving-Future_Realizing-Productivity-Gains-and-Spurring-Economic-Growth.pdf.

⁵ Roger Lancot, “Accelerating the Future: The Economic Impact of the Emerging Passenger Economy,” Strategy Analytics (June 2017) available at <https://newsroom.intel.com/newsroom/wp-content/uploads/sites/11/2017/05/passenger-economy.pdf>.

In particular, C_TEC's "Automated Vehicle Policy Principles" can provide input to support NHTSA's consideration of differing approaches to revising crash avoidance test procedures and the demonstration that an ADS-equipped vehicle is at least as safe as a human driver. Specifically, C_TEC's principle titled "Advance Safe Automated Vehicle Development, Testing and Deployment" states the following:

"...To demonstrate that an ADS-equipped vehicle is at least as safe as a human driver, C_TEC recognizes the need for metrics beyond vehicle miles traveled and disengagements. Therefore, policymakers should encourage the broad AV industry to collaboratively develop a technology-neutral and transparent performance-based model for AV safety decision-making in conjunction with leading standards bodies.

Also, to increase consumer trust, C_TEC supports a comprehensive test of the safety of a vehicle's decision-making and perception systems. Consistent with the USDOT recognition that on-road testing is one of several aspects for ADS safety assurance, C_TEC recognizes that ADS/AV safety testing can be performed along multiple paths, for example, (i) on-road testing; (ii) verification of the vehicle's decision-making to an industry accepted, performance-based safety model; and (iii) testing of the vehicle's perception system using data sets."

Conclusion

C_TEC applauds NHTSA for publishing this ANPRM and working to advance the safe development, deployment and testing of ADS-equipped vehicles. C_TEC thanks NHTSA for its leadership and looks forward to working with NHTSA on this issue moving forward.

Respectfully submitted,



Tim Day
Senior Vice President
Chamber Technology Engagement Center
U.S. Chamber of Commerce