



February 15, 2022

Via Electronic Filing

U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Room W12-140
Washington, DC 20590

Re: Transportation Research and Development Strategic Plan (Docket No. DOT-OST-2021-0160); 86 FR 74429

To Whom It May Concern:

The U.S. Chamber Technology Engagement Center (“C_TEC”)¹ appreciates the opportunity to comment on the Department of Transportation’s (“DOT”) *Transportation Research and Development Strategic Plan for Fiscal Years 2022-2026*. (“Strategic Plan”).² C_TEC commends DOT for proactively seeking stakeholder feedback to inform the development of this Strategic Plan. C_TEC’s comments focus on several aspects of DOT’s responsibilities: automated vehicle technology, rail safety technologies, and emerging aviation technologies including advanced air mobility (“AAM”) and unmanned aircraft systems (“UAS”).

DOT is critical to laying a foundation for the future of transportation by facilitating innovation across all modes including rail, automotive, trucking, and aviation. C_TEC highlighted our priorities in transportation technologies in recent comments on DOT’s Strategic Plan for FY22-26.³ A foundational element of DOT’s efforts are federal investments

¹ C_TEC was launched to advance technology’s role in strengthening business by leveraging tech innovations that drive economic growth in the United States. C_TEC promotes policies that foster innovation and creativity and sponsors research to inform policymakers and the public.

² Transportation Research and Development Strategic Plan; Request for Information, 86 Fed. Reg. 74430 (proposed Dec. 30, 2021).

³ Chamber of Com. of the U.S., Comment Letter on Request for Comment on U.S. DOT Strategic Plan (Dec. 31, 2021), https://americaninnovators.com/advocacy/c_tec-comments-to-the-ftc-on-proposed-fy-2022-2026-strategic-plan/.

in R&D. Historically, the federal government has played a critical role in R&D.⁴ Unfortunately, the U.S. share of global R&D has declined from 69% from the post-war period to 27.7% today and R&D spending as a percentage of the federal budget is at 60 year low at 2.8%.⁵ However, American business has stepped up and currently invests \$404.2 billion annually in R&D, 69.7% of total R&D spending.⁶ On a government-wide level, we recommend that the federal government reverse the decline in its R&D investments.

Specific to DOT, C_TEC believes DOT should prioritize R&D in emerging transportation technologies including automated vehicles, rail safety technologies, and emerging aviation technologies including advanced air mobility (“AAM”) and unmanned aircraft systems (“UAS”). Many other countries are making significant advances in these technologies, which puts the U.S. at risk of falling behind in these critical sectors. Consequently, the U.S. must exercise leadership in emerging transportation technologies, including through R&D. Below are C_TEC’s specific recommendations.

First, C_TEC believes that multi-stakeholder engagement is critical, especially with industries involved in emerging transportation technologies. We encourage continued collaboration on existing partnerships as well as exploring new opportunities to collaborate with industry stakeholders on R&D projects and programs. Moreover, DOT should regularly communicate with all stakeholders, including industry, on DOT’s posture and initiatives relating to transportation R&D to provide certainty and transparency for DOT activities.

Second, C_TEC encourages DOT to lead and collaborate with other relevant federal agencies to take a “whole of government” approach to leveraging R&D to advance emerging transportation technologies similar to the DOT’s 2021 “Automated Vehicle Comprehensive Plan” in the context of automated vehicle policy.

Third, C_TEC encourages DOT to effectively implement and leverage programs and requirements in the recently enacted “Infrastructure Investment and Jobs Act” (“IIJA”) to advance emerging transportation technologies.⁷ This law includes research programs that focus on automated and connected vehicles and rail research programs, including advanced technologies, and it establishes the Advanced Research Projects Agency – Infrastructure.⁸ C_TEC notes IIJA’s emphasis on protecting critical infrastructure from cybersecurity threats and encourages DOT to pursue R&D in collaboration with industry to strengthen transportation system resilience against cyber disruptions, an objective set forth in the FY22-26 DOT Strategic Plan.

Fourth, as other countries make investments in R&D, the U.S. should not risk falling behind our global competitors. C_TEC, therefore, strongly encourages DOT to assess the R&D

⁴ *Building Back the U.S. Research Enterprise: COVID Impacts and Recovery Before the H. Comm. on Sci., Space, and Tech.*, 117th Cong. (2021) (statement of Tom Quaadman, Executive Vice President, U.S. Chamber of Commerce).

⁵ *Id.*

⁶ *Id.*

⁷ Infrastructure Investment and Jobs Act, Pub. L. No. 117-48, 135 Stat. 429.

⁸ *See* IIJA § 13005, 13006, 22102(b) and (d), 22413, and 25012

progress of other countries in emerging transportation technologies and prioritize actions, which advance, not stymie, these technologies.

C_TEC appreciates the opportunity to provide comments to the *Transportation Research and Development Strategic Plan*. We believe that DOT can play a crucial role to facilitate R&D in emerging transportation. We look forward to working with DOT and DOT's modal agencies on these issues in the future. Please contact Matt Furlow at mfurlow@uschamber.com with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Furlow', with a long, sweeping horizontal stroke extending to the right.

Matt Furlow
Policy Director
Chamber Technology Engagement Center
U.S. Chamber of Commerce