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Department of Transportation  
1200 New Jersey Avenue SE  
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Washington, DC 20590

In the matter of Automated Vehicle Policy Summit (DOT-OST-2018-0017)

To Whom It May Concern:

The U.S. Chamber of Commerce's Technology Engagement Center ("C\_TEC") commends the Department of Transportation ("DOT") for holding its March 1, 2018 public Automated Vehicle Policy Summit. Autonomous vehicles ("AVs") have the potential to revolutionize the American economy and eliminate many barriers that are hindering growth. C\_TEC looks forward to working with DOT on its planned release of the AV 3.0 guidance for autonomous vehicles.

## **I. The Promises of Autonomous Vehicles**

One major barrier to economic growth and productivity is traffic congestion. For instance, as the Chamber's President and CEO Tom Donohue stated, "[b]etween 1990 and 2015, the time Americans spend commuting has increased by about 35 minutes a week."<sup>1</sup> According to one study, traffic congestion cost the US economy nearly \$124 billion in 2013 and could add up to \$2.89 trillion in cumulative losses by 2030.<sup>2</sup> The use of autonomous vehicles can enable more efficient commutes and increase productivity.

In addition to the economic toll, tragically over 40,000 lives were lost in motor vehicles accidents in the United States in 2016.<sup>3</sup> According to the National Highway Transportation Safety

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<sup>1</sup> Remarks by Thomas J. Donohue, "America's Infrastructure Summit: Time to Modernize," (Jan. 18, 2018) *available at* <https://www.uschamber.com/speech/america-s-infrastructure-summit-time-modernize>.

<sup>2</sup> "The future economic and environmental costs of gridlock in 2030: An assessment of the direct and indirect economic and environmental costs of idling in road traffic congestion to households in the UK, France, Germany and the USA," (July 2014) *available at* [https://www.ibtta.org/sites/default/files/documents/MAF/Costs-of-Congestion-INRIX-Cebr-Report%20\(3\).pdf](https://www.ibtta.org/sites/default/files/documents/MAF/Costs-of-Congestion-INRIX-Cebr-Report%20(3).pdf).

<sup>3</sup> Neal E. Boudette, "U.S. Traffic Deaths Rise for a Second Straight Year," *New York Times* (Feb. 15, 2017) *available at* <https://www.nytimes.com/2017/02/15/business/highway-traffic-safety.html>.

Administration (“NHSTA”), nearly 94 percent of auto crashes can be attributed to human error.<sup>4</sup> Vehicles guided with technology such as artificial intelligence (“AI”), LIDAR, and other sensors hold the promise of eliminating human error and foster safer transportation.

Additionally, AVs have the potential to reduce the number of drunk driving incidents<sup>5</sup> as well as give disabled Americans greater mobility.<sup>6</sup> With all of these benefits including congestion alleviation and accident prevention, it is important that federal agencies like DOT promote these new emerging technologies by striking the right regulatory balance.

## II. The Need for Federal Autonomous Vehicle Standards

The promise of AVs will not fully become a reality until use of this new technology becomes ubiquitous. One of the many hurdles to the widespread use of AVs is consumers reluctance to adopt the technology. Increasingly, Americans are becoming more comfortable with the use of AVs as demonstrated by the American Automobile Association which found this year that 20 million more Americans would trust an AV compared to last year.<sup>7</sup>

One significant factor that will lead to increased confidence in autonomous transportation is an effective regulatory environment. Americans overwhelmingly agree that there should be governmental standards for AVs and most of those people find that federal standards are preferable to a patchwork of state laws.<sup>8</sup>

C\_TEC maintains that the best approach to spurring innovation in transportation and autonomous vehicles is to establish a federal standard for safety. It is for this reason that the Chamber supports the approach taken by two bills currently before Congress—H.R. 3388, the SELF DRIVE Act, and S. 1885, the AV START Act. These bills provide for a single AV standard that eliminates the patchwork of 50 state laws which create regulatory uncertainty and hinder testing, innovation, and deployment of potentially life-saving AVs. A federal AV safety standard will contribute toward instilling confidence in consumers about the reliability of autonomous transportation.

Transportation is inherently an interstate matter and for that reason safety standards should be determined on the federal level. At the same time, it should be noted that regulators should understand the rapidly-evolving nature of technological innovation with regard to AVs and not adopt a default approach that seeks top-down and overly prescriptive regulations. C\_TEC applauds

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<sup>4</sup> “NHTSA Data Shows Traffic Deaths Up 7.7 Percent in 2015,” National Highway Transportation Safety Administration (July 1, 2016) available at <https://www.nhtsa.gov/press-releases/nhtsa-data-shows-traffic-deaths-77-percent-2015>.

<sup>5</sup> “MADD Statement on Autonomous Vehicle Technology,” Mothers Against Drunk Driving (Sept. 13, 2017) available at <https://www.madd.org/blog/press-release/madd-statement-autonomous-vehicle-technology/>.

<sup>6</sup> Ashley Halsey III, “Driverless cars promise far greater mobility for the elderly and people with disabilities,” Washington Post (Nov. 23, 2017) available at [https://www.washingtonpost.com/local/trafficandcommuting/driverless-cars-promise-far-greater-mobility-for-the-elderly-and-people-with-disabilities/2017/11/23/6994469c-c4a3-11e7-84bc-5e285c7f4512\\_story.html?utm\\_term=.f0f3aabd8e0e](https://www.washingtonpost.com/local/trafficandcommuting/driverless-cars-promise-far-greater-mobility-for-the-elderly-and-people-with-disabilities/2017/11/23/6994469c-c4a3-11e7-84bc-5e285c7f4512_story.html?utm_term=.f0f3aabd8e0e).

<sup>7</sup> “More Americans Willing to Ride in Fully Self-Driving Cars,” AAA (Jan. 24, 2018) available at <http://newsroom.aaa.com/2018/01/americans-willing-ride-fully-self-driving-cars/>

<sup>8</sup> “Autonomous Vehicle Legislation is Driving Through Congress,” Auto Alliance available at <https://autoalliance.org/connected-cars/automated-driving-systems/public-support/> (48 percent of U.S. adults favor a federal standard, 33 percent support a state patchwork approach).

Secretary Elaine L. Chao’s announcement at the March 1 AV Summit that DOT’s approach for AV 3.0 will be performance-based and not top-down.

### **III. The Best AV Standard and Guidance Approach is Multimodal**

C\_TEC strongly endorses the Secretary’s announcement that AV 3.0 “will be multimodal, and include various surface transportation systems, such as mass transit, rail, and trucking.”<sup>9</sup> In order for the benefits of AV to be fully realized, all modes of autonomous surface transportation should have regulatory parity.

C\_TEC believes that autonomy in surface logistics will be necessary to ensure America leads in digital commerce. According to the U.S. Census Bureau, it is estimated that in the United States total e-commerce sales amounted to \$453.5 billion which was a 16 percent increase from the year before.<sup>10</sup>

Trucking is one of the current major forms of transportation to ensure fulfillment of e-commerce purchases. Unfortunately, the nation is currently experiencing a shortage in the number of truck drivers.<sup>11</sup> One of the many solutions to this shortage in the future will be autonomy. Fortunately, testing has shown that autonomous commercial trucking is viable as demonstrated by Embark which recently conducted a test of an autonomous truck on a 2400-mile trip from California to Florida.<sup>12</sup>

There are a number of exciting innovations and proposals being made in autonomous public and mass transportation as well. Proterra, which is partnering with the Regional Transportation Commission of Washoe County in coordination with the University of Nevada, Reno is currently testing electric buses in Washoe County, Nevada.<sup>13</sup> The City of Jacksonville currently is going forward with a plan known as the Ultimate Urban Circulator (“U2C”) to convert its elevated rail system, the Skyway, into a test track for autonomous shuttles as a mass transit solution.<sup>14</sup> Such programs have the ability to enable greater mobility for economically-disadvantaged residents as well as the elderly and the disabled.

The inclusion of trucking and public transportation in the federal safety framework will be essential to providing the regulatory certainty necessary to ensure that America leads in e-commerce logistics and provides greater mobility through public transportation.

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<sup>9</sup> Remarks Prepared for Delivery by U.S. Secretary of Transportation Elaine L. Chao, AV 3.0 Summit Event, Department of Transportation (Mar. 1, 2018) available at <https://www.transportation.gov/briefing-room/av-30-summit-event>.

<sup>10</sup> U.S. Census Bureau News, “Quarterly Retail E-Commerce Sales 4<sup>th</sup> Quarter 2017,” (Feb. 16, 2018) available at [https://www.census.gov/retail/mrts/www/data/pdf/ec\\_current.pdf](https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf).

<sup>11</sup> Samantha Raphelson, “Trucking Industry Struggles With Growing Driver Shortage,” National Public Radio (Jan. 9, 2017) available at <https://www.npr.org/2018/01/09/576752327/trucking-industry-struggles-with-growing-driver-shortage>.

<sup>12</sup> Darrell Etherington, “Embark’s self-driving truck completes 2,400 mile cross-U.S. trip,” Tech Crunch (Feb. 6, 2018) available at <https://beta.techcrunch.com/2018/02/06/embarks-self-driving-truck-drove-2400-miles-across-the-u-s/>.

<sup>13</sup> Linda Poon, “Reno’s Road to the Future of Autonomous Buses,” City Lab (May 2, 2017) available at <https://www.citylab.com/transportation/2017/05/proterra-eyes-the-future-of-autonomous-buses/524937/>.

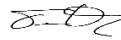
<sup>14</sup> David Bauerlein, “JTA opens test track to future for self-driving transit shuttles,” The Florida Times Union (Dec. 19, 2017) available at <http://www.jacksonville.com/news/metro/2017-12-19/jta-opens-test-track-future-self-driving-transit-shuttles>.

#### **IV. Conclusion**

Autonomy in transportation has the ability to fundamentally transform America's cities and roadways for the better. AVs promise safer roads, reduced congestion and greater mobility for those currently left without transportation options such as low-income residents, the disabled, and the elderly. C\_TEC believes that in order to facilitate the widespread deployment of this technology, policymakers, including DOT, should embrace a multimodal, federal safety approach.

C\_TEC thanks the Secretary and DOT for your leadership and looks forward to working with you on this critical issue in emerging technology.

Sincerely,



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