

**CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA**

TIM DAY
SENIOR VICE PRESIDENT
CHAMBER TECHNOLOGY
ENGAGEMENT CENTER(C_TEC)

LISA RICKARD
PRESIDENT
U.S. CHAMBER INSTITUTE
FOR LEGAL REFORM

October 3, 2017

The Honorable John Thune
Chairman
Committee on Commerce, Science, and
Transportation
United States Senate
Washington, D.C. 20510

The Honorable Bill Nelson
Ranking Member
Committee on Commerce, Science, and
Transportation
United States Senate
Washington, D.C. 20510

Dear Chairman Thune and Ranking Member Nelson:

The U.S. Chamber of Commerce thanks the Committee for its leadership on S. 1885, the “AV START Act,” and for its recognition of the safety and mobility benefits of autonomous technology.

Self-driving vehicles present tremendous opportunities for consumers, businesses, and the U.S. economy by making travel safer, enhancing productivity, and increasing transportation efficiency. However, regulatory and other barriers can impede the development of self-driving vehicles.

The Chamber created the Technology Engagement Center (C_TEC) to promote the role of technology in the economy and to advocate for rational policies that drive economic growth, spur innovation, and create jobs. The Institute for Legal Reform (ILR) is an affiliate of the Chamber dedicated to making the civil legal system simpler, faster, and fairer for all participants.

C_TEC convenes an autonomous vehicle working group representing sectors across the economy to help guide policymakers, regulators, the public at large, and the business community on the benefits of self-driving vehicle technologies. This group represents a diverse membership, including Original Equipment Manufacturers, software, and insurance companies among others.

We appreciate the legislation’s provisions for a single national framework for vehicle safety and performance standards, and we urge the Senate Commerce Committee to ensure that such a framework applies to all types of motor vehicles including commercial vehicles. We also believe that the legislation requires effective preemption provisions; while there is always room for improvement, we support the text currently in the legislation.

To be competitive in the global autonomous vehicle market, legislators must strike the critical, yet challenging, balance between innovation, safety, and privacy when developing standards for autonomous vehicles. Innovators need a single set of federal standards as opposed

to a patchwork of state laws, rules and regulations. We encourage the Committee to ensure that the legislation's preemption provisions protect innovation and development from inconsistent state liability rules, potentially expansive litigation and entrepreneurial plaintiffs' lawyers. Without effective and appropriate preemption, we risk impeding our innovators and ceding our leadership in this industry.

As S. 1885 moves through the legislative process, the Chamber looks forward to working with the Committee to further refine and improve the bill.

Sincerely,



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



Lisa Rickard
President
U.S. Chamber Institute for Legal Reform

cc: Members of the Committee on Commerce, Science, and Transportation