July 23, 2018

TO THE MEMBERS OF THE UNITED STATES SENATE:

The Intelligent Transportation Society of America (ITS America) supports S. 1885, the “AV START Act,” which would establish federal oversight of how manufacturers are addressing the safety of highly automated vehicles (HAVs). Currently, there are no federal regulations specifically governing the safety of HAVs. The AV START Act would put in place federal oversight of the safety of these vehicles. The bill’s Safety Evaluation Report would require manufacturers and other entities developing and testing HAVs to explain to the National Highway Traffic Safety Administration (NHTSA) and the public how vehicle safety is being addressed, including pedestrian protection.

The AV START Act creates a federal framework for HAV development and deployment, as well as reinforces state and local roles by maintaining their authority over the operation of HAVs on public roads and memorializes the federal role in ensuring the safety of HAVs as it relates to design, construction, and performance.

The bill establishes a process in which developers can apply to NHTSA to demonstrate that features of their products provide an equivalent level of safety to those required by Federal Motor Vehicle Safety Stands (FMVSS). One of the most important aspects of the AV START Act is that it requires NHTSA to develop FMVSS for self-driving vehicles on an expedited basis. This is necessary because the automobile and technology industries need experience operating these vehicles in sufficiently substantial numbers to generate the broad data across a multitude of scenarios and environmental operating conditions necessary to ensure safety.

37,461 people died in U.S road crashes in 2016. This is an increase of 5.6 percent from 2015, which in turn represented a substantial increase from 2014. Today, we are on the cusp of a safer future transformed by automated vehicle technologies. These technologies have the potential to eliminate the 94 percent of crashes caused by human error.

ITS America members have been researching, developing, and testing automated driving technologies for more than two decades. Founded as an official advisory board to the U.S. Department of Transportation, we represent state and city departments of transportation, metropolitan planning organizations, automotive manufacturers, technology companies, engineering firms, automotive suppliers, insurance companies, and research universities.

We commend the leadership of Senate Commerce, Science, and Transportation Committee Chairman Thune, Ranking Member Nelson, and Senator Peters and urge passage of the AV START Act.

Sincerely,

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