

## **SB 427 Discussion Items – ITS Pennsylvania**

March 23, 2017

1. Page 7, lines 16 – 20 - How long is the permit valid for - two years since audits occur every two years per section 3622?
2. Page 8, lines 6 – 9 – The intent of subparagraph 5 is unclear.
3. Page 8, lines 20 – 24 – Subparagraph 2 may need re-written to provide the intended meaning.
4. Page 9, lines 2 – 5 – Subparagraph 2 seems ambiguous and impractical. Unclear on the intent.
5. Page 10, lines 26 - 30 – Consider removing this statement. Such notification is already allowed.
6. Page 11, lines 2 – 5 – Should there be immediate notification to the Department and/or ceasing of the testing?
7. Page 11, lines 17 – 18 – Consider removing the phrase ‘if the highly automated vehicle or platooning is connected to the infrastructure.’
8. Page 11, Section 3621(a) – Should the tester submit insurance, surety bond, or proof of self-insurance? Other states have this FL HB 7061, MI SB 169, and NV SB 313.
9. Pages 12 – 13, Subchapter E- Liability - Several states have included limits on liability for manufacturers related to damages that arise out of modifications made by others (see for example Michigan SB 663 and SB 998, Nevada SB 313, DC B 19-0931).
10. Page 13, lines 5 – 6 – Do standard vehicles in the platoon need to be registered under this legislation?
11. Pages 16 -19, Subchapter I, Penalties – Assume the triggers of suspension vs. cancellation will be detailed in the regulations.
12. Page 19, lines 11 -13 – Does this include violations to a license when not operating a HAV? In standard vehicle?
13. Pages 20 – 21, Section 3691(b) – Should there be legal and/or IT/cybersecurity representation on the Committee?
14. Page 23, lines 12 – 26 – Should traffic control device regulations, including work zones be included?
15. General – Are the permitting, test operator licensing, titling, and/or vehicle registration requirements specific to PA going to make it impractical to cross state borders either into or out of Pennsylvania for testing?
16. General – several instances of the use of ‘immediately’ or reasonable. Assume this will be clarified through regulation, policy or guidance.