

**STATEMENT FOR THE RECORD
BEFORE THE PENNSYLVANIA HOUSE AND SENATE COMMITTEES ON
TRANSPORTATION TO RECEIVE REMARKS FOR INFORMATIONAL PURPOSES
ON AUTONOMOUS AND CONNECTED VEHICLE TECHNOLOGY**

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On behalf of the Association of Global Automakers (“Global Automakers”), I am pleased to provide the following statement for the record to the Pennsylvania House and Senate Committees on Transportation. Global Automakers appreciates this opportunity to discuss with the Committees the benefits of advanced vehicle technology and public policy considerations needed to encourage continued investment and innovation.

Global Automakers represents the U.S. operations of international automobile manufacturers that design, build, and sell cars and light trucks in the United States. These companies have invested \$56 billion in U.S.-based facilities, directly employ nearly 100,000 Americans, and sell nearly half of all new vehicles purchased annually in the country. Combined, our members operate more than 300 production, design, R&D, sales, finance and other facilities across the United States.

Advancing Vehicle Automation Has Enormous Benefits

The automotive industry is in the midst of an unprecedented wave of technological innovation that is redefining how we think about transportation. The rapid pace of automated and connected vehicle technology presents significant opportunities for enhancing mobility, saving lives, improving transportation efficiency, and reducing fuel consumption and greenhouse gas emissions.

Automated and connected vehicle technology represents the next big step in motor vehicle safety. Over the past several decades, our members have invested, and continue to invest,

significant resources to accelerate life-saving vehicle innovation. Much of these efforts have been focused on improving the safety of vehicle occupants in the event of a crash. **The next step in this technological evolution is to avoid crashes altogether, and that is where vehicle automation can play a significant role.**

It is important to recognize that **vehicle automation is much broader than the “self-driving” or “driverless” car** that is featured so prominently in the press. In fact, advanced automated technology is already featured in a number of vehicles on the road today, such as crash imminent braking, lane keeping assist, and adaptive cruise control. These systems, which are often considered foundational to the development of more highly automated systems, are designed to provide support to the driver in certain situations, and are not designed to maintain vehicle control over an extended period of time. The capability of vehicles to operate without the active control of the driver will evolve as advanced automated systems improve.

Over time, vehicles will provide more automated features and functionality, and this is a good thing for consumers. Despite substantial advances in auto safety over the last several decades, preliminary data shows as many as 40,000 people died in 2016, a six percent increase in deaths year-over-year, and a 14% increase since 2014. An estimated 94% of crashes are attributed to driver error.

Through further advancements in vehicle automation, **we have the potential to reduce both the occurrence and severity of crashes in the future** by taking corrective action for human driving errors. Advanced automotive technology will not only help mitigate crashes and save lives, but also will benefit the environment, improve traffic congestion and potentially provide mobility independence for those with disabilities.

Advancing Vehicle Automation Requires the Right Public Policy

Automated vehicles have garnered significant media attention and have captured the imaginations and interest of both the public and policymakers alike. As is the case with any new and transformative technology, the idea of increased vehicle automation is often met with mixed reactions ranging from fear, uncertainty, and doubt, to excitement and anticipation for the future

of “self-driving.” It is important that we do not let misguided fears lead to unnecessary and counter-productive legislation or regulation. Taking the wrong approach will only delay the development and deployment of automated vehicle technologies and this will cost lives.

In September 2016, the National Highway Traffic Safety Administration offered a measured response, providing “Guidance” for the developers of automated vehicles and considerations for state policymakers. The Guidance recognized that technology will advance more rapidly than regulation.

Despite this clear leadership at the federal level, there have been several state proposals imposing significant barriers to testing and deployment of automated vehicle. States such as California, Nevada, Florida, and Michigan, as well as the District of Columbia, have already enacted laws related to the testing and operation of automated vehicles. Each of these states has taken a slightly different approach to the issue. Even more concerning is that we have seen several pieces of legislation introduced in state Capitols that would actually prohibit vehicles currently in use on public roads.

This year alone, more than 50 legislative proposals related to automated vehicles have been introduced in the states. These laws often include conflicting definitions of what constitutes an automated vehicle as well as various vehicle requirements that can dictate the way automakers must design and manufacture systems.

This activity at the state level presents significant challenges for the auto industry. For instance, what would happen if an automated vehicle is certified as meeting the design criteria for one state but not another state? Would the vehicle be banned from crossing the state line? From the perspective of an automobile manufacturer, a single national approach to the design and production of automated vehicles is of paramount importance. Erecting barriers to the testing and deployment of automated vehicles at the state level will only hamper investment and innovation in this life-saving technology.

Pennsylvania Can Open the Road to Automated Vehicle Innovation

Pennsylvania has demonstrated in a variety of ways its support for promoting advanced vehicle automation. In 2016, the Pennsylvania Department of Transportation (PennDOT) urged the Federal Communications Commission to preserve the 5.9 GHz band, also known as the “Safety Spectrum.” The Safety Spectrum is the foundation for Dedicated Short Range Communication (DSRC), a cutting-edge technology able to securely, reliably and rapidly transmit life-saving communications between vehicles, pedestrians and infrastructure. Allowing cars to effectively “talk” to each other will go a long way in avoiding accidents.

Global Automakers congratulates the Commonwealth of Pennsylvania, and in particular the City of Pittsburgh for being designated as an automated vehicle “proving ground” by the U.S. Department of Transportation. Pittsburgh, one of ten communities selected around the country, will openly share best practices on the safe conduct for testing and operating autonomous vehicles. Collectively, these proving grounds will play a key role in accelerating innovation as well as enabling the public and policymakers to learn about the benefits of automated technology.

The proving ground designation comes on top of Pittsburgh’s collaboration with Carnegie Mellon and Uber to test automated vehicles in a ride sharing environment. This testing experience allows the innovator and public alike the ability to understand the benefits of automated vehicle technology in real-world situations on public roads.

These are only three examples where Pennsylvania is leading the nation supporting automated vehicle technology by engaging with key stakeholders, collaborating with researchers and technical professionals, and most importantly, allowing innovators to test and operate in the Commonwealth. **With so many achievements made and more to come, the logical question some policymakers might ask is: “Does Pennsylvania need legislation, such as Senate Bill 427, to foster the right automated vehicle public policy and to create the right environment for further innovation?”**

In our view, the answer is: “No.”

We commend the work Pennsylvania has done looking at this issue. The Pennsylvania Department of Transportation has been active at both the national and state levels to develop automated vehicle standards and practices. PennDOT convened a taskforce and recommended changes to Pennsylvania law, including broad rulemaking authority to the Secretary of Transportation to oversee automated vehicle testing implementation. Global Automakers provided several iterations of comments and language revisions both to PennDOT as well as legislative staff drafting legislation simultaneous with the development of taskforce recommendations. While some of our suggestions have been included, the proposed legislation continues to raise serious concerns. Given these concerns, Global Automakers **opposes Senate Bill 427** (Vulakovich, Fontana, Costa, et al.).

This bill is limited to testing but erects unnecessary barriers for companies seeking to test automated vehicles in the state. For one, it would grant the department of motor vehicles open-ended and nebulous regulatory authority to grant or deny a testing permit without providing any standards for exercising that authority. Another provision establishes an onerous and burdensome permit application process, including a notice and comment period. The bill would also limit the number of automated vehicles that may receive a testing permit, thereby limiting innovation. These barriers do nothing to support motor vehicle safety and would impede the development and testing of automated vehicles in Pennsylvania.

Global Automakers believes there is an alternative public policy path to supporting the economic development, and the societal and safety benefits of automated vehicle technology. Ohio, for example, has demonstrated how to promote autonomous vehicle testing without the need to enact new laws or rules. The city of Columbus was selected as the first “Smart City Challenge” grant recipient, becoming the first fully integrated connected transportation network in the nation. In addition, Governor Kasich has designated a stretch of US-33 as an innovation corridor and committed state resources to accelerate testing. Finally, Ohio established the “Smart Belt Coalition,” working across state borders to support research and development of automated and connected vehicle technology.

Conclusion

Pennsylvania should be cautious about enacting unneeded laws or regulations concerning vehicle automation. As seen by Pennsylvania's successes to date, new legislation is not necessary to spur investment and innovation in this area. Close collaboration and coordination among government, industry, academia and others is required to ensure a flexible and consistent approach to automated vehicle policy. Pennsylvania has demonstrated its commitment to promoting innovative technology and working alongside all stakeholders. We believe continued discussion and dialogue by the PennDOT taskforce is needed while automated vehicle testing continues and expands. After an appropriate time, when additional testing is completed and more questions are answered should policymakers consider whether legislation and if so, what legislation is required.

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