

**Testimony of Chan Lieu, on behalf of
the Self-Driving Coalition for Safer Streets**

**Senate and House Transportation Committees
Commonwealth of Pennsylvania
Joint Hearing – Highly Automated Vehicles (HAV) Testing Legislation
Tuesday, March 21, 2017**

Chairman Rafferty, Minority Chair Sabatina, Chairman Taylor, Democratic Chair Keller, and Members of the respective Senate and House Committees, on behalf of the Self-Driving Coalition for Safer Streets (“Coalition”), my name is Chan Lieu, and I am pleased to submit this written testimony for the Committees’ joint hearing on Highly Automated Vehicles Testing Legislation.

The Coalition was founded in April of last year by Ford Motor Company, Waymo (formerly Google’s self-driving car project), Lyft, Uber, and the Volvo Car Group. We are focused on enabling the safe and swift development and deployment of fully autonomous vehicles (“AVs”). This cross-section of companies representing technology, automobile manufacturing, and transportation network companies demonstrates the widespread interest in developing this technology across different sectors. Despite their different backgrounds, the companies came together to form the Coalition because of their commitment to bring the tremendous potential safety and mobility benefits of self-driving cars to consumers in the safest and swiftest manner possible.

The Coalition believes fully autonomous vehicles have great potential to make our roads safer and more accessible. Data from the National Safety Council estimates that more than 40,000 Americans died in motor vehicle crashes last year. Since an estimated 94 percent of all crashes are the result of a human decision (whether driving drunk, distracted, fatigued, or at excess speeds), fully autonomous vehicles have the potential to dramatically reduce fatal traffic accidents because they remove human error from the driving process entirely. In addition to these potential safety benefits, self-driving vehicles hold the promise to enhance mobility for the disabled and elderly, reduce congestion, and improve productivity.

Given the Coalition’s enthusiasm for fully autonomous vehicles (more specifically, those vehicles defined as Levels 4 and 5 by the Society of Automotive Engineers) and our strongly held view that self-driving vehicles have the potential to change the country for the better, we support efforts at the state level to facilitate the rapid testing and deployment of fully autonomous vehicles. Likewise, we have concerns with legislation in any state that unduly limits or impedes the advancement and public use of this technology.

States will play a critical role in the deployment of fully autonomous vehicle technology, and the Coalition is encouraged that legislators in Pennsylvania recognize the significance of AV technology. The fact that these two committees are holding a hearing on AV technology is encouraging and is a step in the right direction.

The Coalition wholeheartedly supports Pennsylvania's interest in fully autonomous vehicles, but is deeply concerned that SB 427 would severely restrict the development and deployment of self-driving technology in the Commonwealth. The Coalition believes that this legislation is a well-intended effort to achieve the laudable goals of improved safety, mobility, congestion, and productivity but falls short for several fundamental reasons. As a result, we respectfully call upon the legislature to shift its consideration with respect to AV technology to explicitly include measures and steps that would facilitate greater testing and the rapid deployment of self-driving vehicle technology

We are concerned that SB 427 would create substantial obstacles to the deployment of self-driving vehicle technology for several reasons. As a threshold matter, the bill imposes substantial regulatory hurdles for entities seeking to engage in testing of AV technology. This approach departs from the National Highway Traffic Safety Administration's (NHTSA) longstanding approach of encouraging innovation and development in new technology while requiring that manufacturers self-certify that vehicles adhere to a common set of motor vehicle safety standards. NHTSA is the agency responsible for ensuring safety on the American roadways and capably employs its broad enforcement and recall authority to ensure that companies do not introduce *unreasonable risks to safety* to our roadways.

A cumbersome pre-approval process runs completely counter to the way this country has historically advanced automotive safety. From critical safety technologies such as seat belts, to airbags, to electronic stability control, this country has a strong history of allowing the industry to innovate, develop, and deploy new safety technologies before rushing in to define and mandate what they are. The pre-approval approach set forth by SB 427 would have the effect of stifling the development and rollout of AV technology and denying the safety and mobility benefits that this technology promises.

Second, SB 427 focuses exclusively on the testing of AV technology, making no provisions for its deployment. A testing-only approach is one that has been rejected by policymakers in other jurisdictions, such as Arizona, Florida, and Michigan, because AV technology is advancing at a rapid pace. Further, they are preparing for its safe deployment and taking steps to be leaders in facilitating innovation. Coalition members are deeply concerned that proceeding with a testing-only approach sends the signal that AV deployment is not welcome in the Commonwealth. Moreover, it is an approach that is short-sighted and detrimental to the substantial investment that several entities have made in Pennsylvania to date.

Moreover, because AV technology is nearing deployment, a testing-only bill would likely be outdated the moment it takes effect and another legislative effort would be required almost immediately to clear a path for Level 4 and Level 5 vehicles to be deployed on Pennsylvania roads. To the extent the legislature seeks to take action in the area of AV technology, it should address testing and deployment, rather than testing alone. More specifically, the state should examine existing statute and regulations to determine if any present an obstacle to Level 4 and Level 5 AV deployment.

The Coalition appreciates the opportunity to share our views on the deployment of fully autonomous vehicles in Pennsylvania. We are encouraged to learn that alternative legislation to permit testing and deployment may be considered and are committed to working collaboratively with you on reasonable policies that support safety and innovation moving forward.