



February 14, 2019

The Honorable Nancy Pelosi  
Speaker of the House  
U.S. House of Representatives  
H-232, The Capitol  
Washington, D.C. 20515

The Honorable Kevin McCarthy  
Minority Leader  
U.S. House of Representatives  
H-204, The Capitol  
Washington, D.C. 20515

The Honorable Mitch McConnell  
Majority Leader  
United States Senate  
S-230, The Capitol  
Washington, D.C. 20510

The Honorable Charles Schumer  
Minority Leader  
United States Senate  
S-221, The Capitol  
Washington, D.C. 20510

Speaker Pelosi, Minority Leader McCarthy, Senate Majority Leader McConnell, and  
Minority Leader Schumer:

On behalf of the Alliance of Automobile Manufacturers, an association of 12 leading automotive manufacturers representing just over 70 percent of light duty vehicles sold in the United States, I write to encourage both the U.S. House of Representatives and the U.S. Senate to continue bipartisan efforts to develop a federal framework to provide for the safe development, testing, and eventual deployment of automated vehicles (AVs) in the United States.

In 2017, there were 37,133 lives lost on U.S. roadways, a similar number to 2016. These statistics are all the more sobering in light of the National Highway Traffic Safety Administration's (NHTSA) research that shows 94% of all accidents are due to human choice or error. As auto manufacturers, we are focused on ways to improve overall safety and help decrease the number of lives lost on our nation's roadways. Automated vehicle technology offers the potential to reduce the number of collisions and lives lost each year.

Key stakeholders recognize the need for greater federal clarity to foster the development and ultimate deployment of these life-saving technologies. More specifically, Congress has a critical role to help accelerate both public acceptance and deployment of these life-saving technologies in the following manner:

First, federal legislation must reinforce the traditional and established roles of both the federal and state governments when it comes to regulating vehicles. Without federal clarity, a regulatory vacuum is likely to be created with respect to these new vehicle safety technologies, which could result in states wading into regulating the design, construction, or performance of such vehicles or technologies on a state-by-state basis. That action would usurp the traditional and appropriate role that the federal government and the Department of Transportation have held for generations. A federal framework, similar to the design included in both the SELF DRIVE Act (H.R. 3388) and the AV START Act (S. 1885) during the previous Congress, would preserve both the traditional roles of the federal and respective state governments. Such a federal framework would also prevent a patchwork of regulations that could hurt American competitiveness, decrease mobility options for millions of Americans, and stymie investment in research and development of these critical vehicle technologies.

Second, the number of eligible NHTSA-authorized exemptions available to each manufacturer on a case-by-case basis should be expanded for AVs to allow for the data-collection needed to inform and support future regulation of these technologies. The creation of a new Federal Motor Vehicle Safety Standard (FMVSS) typically takes 8-10 years and relies on data from real-world technological development. This data can be generated from appropriate testing on public roadways with requisite oversight and regulations from NHTSA, just as is done today. This oversight includes existing broad defect and recall authority.

Third, any successful legislation should provide a clear pathway to update existing FMVSS where a human driver is referenced. Many of the rules that currently govern the operation of a motor vehicle were created at a time when a self-driving vehicle was a science-fiction fantasy, rather than a technological breakthrough on our doorstep. Updating these regulations in an expeditious manner is a common sense step to increase overall roadway safety.

Finally, it is important to highlight that we anticipate that this legislation likely will be the first installment of Congressional action to govern AV technologies. We witnessed an effort by some stakeholder groups last Congress to expand the scope of any possible AV legislation to include ancillary issues or attempts to resolve prospective but unknown issues related to AV technology. Knowing such actions could very well undermine the goals of bipartisan legislation that was close to enactment last Congress, we urge Members of Congress to move forward with a bill focused on the objective of creating a solid foundation for future legislation and regulation. After all, accepting the status quo only slows down the real and consequential progress that can be made in AV technology that will help reduce the accidents attributable to human choice or error.

We look forward to working in a bipartisan manner with the House Energy and Commerce Committee and the Senate Committee on Commerce, Science, and Transportation on this important issue. We are excited by the opportunity to work

together to establish a framework ensuring the U.S. maintains its leadership and investment in these critical safety technologies that will transform not only the overall mobility of the American public but also improve roadway safety for generations to come.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitch Bainwol", with a stylized flourish at the end.

Mitch Bainwol  
President and CEO  
Alliance of Automobile Manufacturers, Inc.

cc: All Members of the U.S. House of Representatives and U.S. Senators