



Summary of Statement of Catherine Chase, President, Advocates for Highway & Auto Safety

According to the federal government, each year motor vehicle crashes kill tens of thousands of people and injure millions more at a cost to society of over \$800 billion. Advocates for Highway and Auto Safety (Advocates) is optimistic that automated vehicle (AV) technology has the potential in the long term to make significant and lasting reductions in this mortality toll. However, as the Senate takes the first step to creating national policy on AVs, it is critically important that the Senate AV START Act, S.1885, include provisions that advance this technology while ensuring that public safety is protected in its early days as well as later. This technology will have long lasting consequences, and it is essential that Congress get this right, and require critical safeguards and oversight. Currently the Senate bill creates a flawed process for AV deployment. Advocates has put forward 12 recommendations which we urge the Senate to consider:

- Reduce the number of AVs that will be permitted to be exempt from critical federal safety standards. Increase the time period after granting an exemption from 12 to a minimum of 24 months so that the National Highway Traffic Safety Administration (NHTSA) has an opportunity to collect enough data to make accurate safety assessments before permitting more exempt AVs to be sold.
- Prohibit any and all exemptions from federal safety standards that will diminish the level of occupant protection currently provided by the Federal Motor Vehicle Safety Standards (FMVSS).
- Eliminate the provision that permits manufacturers to unilaterally disable critical safety systems while the vehicle is operating in autonomous mode.
- Ensure that manufacturers are required to include sufficient data and documentation in the safety evaluation report (SER) to ensure that NHTSA has enough information to accurately assess the technology.
- Provide consumers with critical information about the capabilities and limitations of AVs. Direct NHTSA to immediately require information at the point of sale and in the vehicle's owner manual.
- Direct NHTSA to establish a publicly-available AV database with basic safety information for consumers and for use in safety research.
- Require manufacturers to report all crashes involving an AV to NHTSA.
- Amend the AV START Act to apply critical safety provisions to Level 2 AVs.
- Direct NHTSA to issue safety standards addressing critical safety issues involving AVs including cybersecurity, driver engagement, electronics systems and the ability to detect objects in its driving environment.
- Provide additional legal authority to NHTSA to enable the agency to effectively respond to crises and protect public safety.
- NHTSA must be given additional funding and a new dedicated office to AVs should be created to meet demands being placed on the agency with regard to the advent of AV technology.
- Until NHTSA issues comprehensive standards and regulations to govern AVs, states must not be precluded from enacting state developed solutions to protect their citizens.