



**Consumer Federation of America**

## **Autonomous Vehicle Legislation Needed that Puts People First**

Comments of  
Jack Gillis, Executive Director  
Consumer Federation of America  
at  
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organized by  
Advocates for Highway and Auto Safety

One of the most powerful agents for change and consumer protection is publicly available comparative information. Because of the enormous complexity of autonomous vehicles and the corresponding consumer concerns about their deployment, easy to understand, readily accessible, and comparative consumer information about AVs, and safety feature performance, must be a top priority of NHTSA.

Making this information available is the only way to enable consumers to make informed purchase decisions and it will put enormous market pressure on manufacturers to improve safety feature performance. The publishing of NCAP crash tests provides powerful evidence of how the market presence of comparative information dramatically improved safety performance.

Because AVs will be collecting enormous amounts of personal data, the need to protect consumer privacy is critical. There must be full transparency about the collection of personally identifiable information, and it must only be collected on an opt-in basis and with consumers in complete control of their information. In addition, the transmission of vehicle information must be held to the highest possible cybersecurity measures. Non-personal information about vehicle safety performance must be made available to NHTSA and the public for research purposes and the radio spectrum needed for the operation of AVs, must be strictly limited to non-commercial use.

To ensure that employees and contractors are free to disclose potential safety defects to NHTSA, the whistleblower protections afforded in the MAP-21 and FAST Act must be included in any AV Bill. It is also critical that consumer's right to seek accountability for AV related injuries be absolutely preserved.

Finally, the only way to ensure the safe introduction of AVs is to provide NHTSA with desperately needed additional talent and funding. Not to provide this critically important agency with needed resources is simply regulatory malfeasance. A robust NHTSA is not only critical to the public health of America but will provide manufacturer guidelines that will ensure the success of their autonomous vehicles.

We appreciate the Advocates for Highway and Auto Safety for putting together this extraordinarily diverse group of organizations who together are fighting to insure the full potential of autonomous vehicles.

*The Consumer Federation of America is an association of more than 250 nonprofit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy, and education.*

