



ADVOCATES  
FOR HIGHWAY  
& AUTO SAFETY

November 22, 2024

The Honorable Charles Allen, Chair  
Committee on Transportation and the Environment  
Council of the District of Columbia  
1350 Pennsylvania Avenue, NW  
Washington, District of Columbia 20004

Dear Chair Allen:

Advocates for Highway and Auto Safety (Advocates) is an alliance of consumer, safety, medical, public health and law enforcement groups and insurance companies working together to pass highway and auto safety laws that prevent crashes, save lives, reduce injuries and contain costs. We respectfully submit the following information for your consideration regarding the Committee's public roundtable, "Use and Regulation of Autonomous Vehicles."

- Congressional Testimony and Letters: Over the last few years, Advocates has testified before Congressional Committees or submitted letters for the hearing record on the issue of automated driving system (ADS) and autonomous vehicle (AV) safety numerous times. Most recently, I was a witness at the House Transportation and Infrastructure Subcommittee on Highways and Transit hearing, "The Future of Automated Commercial Motor Vehicles: Impacts on Society, the Supply Chain and U.S. Economic Leadership" on September 13, 2023, for which we submitted the following written [statement](#). Additionally, we submitted this [letter](#) to the Senate Commerce, Science and Transportation Committee on July 30, 2024, and this [letter](#) to the Senate Committee on Commerce, Science and Transportation Subcommittee on Surface Transportation, Maritime, Freight and Ports on May 20, 2024.
- AV Tenets: Since 2020, Advocates has been leading a broad group of stakeholders in support of the AV Tenets to guide federal legislation and policy for the safe development and deployment of AVs. The Tenets are divided into four main categories: prioritizing the safety of all road users; guaranteeing accessibility for all; preserving consumer and worker rights; and, ensuring local control and sustainable transportation. The AV Tenets are a people-and-safety-first guide for AV development. Relevant documents include [AV Tenets Summary](#), [The AV Tenets](#) and the [List of AV Tenets Supporters](#).
- Federal Comments: Advocates is in frequent contact with federal regulators on AVs and ADS. Our most recent comments include a [submission](#) to the U.S. Department of Transportation (DOT) Transforming Transportation Advisory Committee (TTAC) on October 15, 2024, and our [comments](#) in response to the Federal Motor Carrier Safety Administration's (FMCSA) Supplemental Advance Notice of Proposed Rulemaking (SANPRM) regarding commercial motor vehicles (CMVs) equipped with ADS on March 20, 2023. On October 21, 2024, the U.S. Office of Management and Budget (OMB) received the draft Notice of Proposed Rulemaking (NPRM) to establish a demonstration program for ADS-equipped vehicles from the National Highway Traffic Safety Administration (NHTSA). An NPRM for autonomous commercial vehicles (ACMV) is pending at OMB as well. Advocates plans to file comments to the NPRMs once they are published in the Federal Register.
- Public Opinion Polls: Advocates has commissioned two public opinion polls on AVs and safety. Both polls underscored the public's concern with self driving technology and affirmed that government intervention to establish safeguards would help to allay their concerns. For both polls, the responses were consistent across every region of the country and among every age group.

- [2020 Poll Report](#): 85% of respondents noted they are concerned about sharing the road with driverless cars, and 71% strongly support government officials developing minimum performance requirements for new technologies related to the operation of driverless cars.
- [2023 Poll Report](#): 4 out of 5 adults are concerned about sharing the roads with driverless cars, and 64% of respondents feel that their concerns could be adequately addressed by minimum government safety requirements.
- Media: Included are some relevant, pointed articles on the issue of AV safety:
  - Washington Post, "[GM's robot car unit Cruise will pay \\$500,000 over falsified crash report](#)" (11/14/24)
  - Reuters, "[California agency boosts reporting requirements for autonomous vehicle incidents](#)" (11/7/24)
  - Reuters, "[US safety probe into Waymo self-driving vehicles finds more incidents](#)" (5/24/24)
  - CNN, "[Waymo and Zoox are under federal investigation as self-driving cars allegedly behave erratically](#)" (5/14/24)
  - Austin Monitor, "[Records show first responders in Austin struggling to respond to Cruise's self-driving cars](#)" (10/31/23)
  - Governing, "[Why San Francisco Transit Wants a Slower Rollout of Driverless Taxis](#)" (6/13/23)

Thank you for your consideration of this information and your focus on ensuring the safety of the public traveling on public roads in the District of Columbia.

Sincerely,



Catherine Chase, President

Encls: All hyperlinked and identified documents

cc: Members of the Committee on Transportation and the Environment