February 3, 2026

The Honorable Ted Cruz, Chair
The Honorable Maria Cantwell, Ranking Member
Committee on Commerce, Science, and Transportation
United States Senate
Washington, D.C. 20510

Dear Chair Cruz and Ranking Member Cantwell:

In advance of tomorrow's hearing, "Hit the Road, Mac: The Future of Self-Driving Cars," the undersigned write to urge you to pursue a people-and-safety-first approach to the development and deployment of autonomous vehicles (AV). Guardrails to ensure the safety of road users on public roadways must be established. Moreover, we urge you to reject proposals that undermine the safety for vehicles equipped with an automated driving system (ADS) and other road users. Improving public safety, realizing societal benefits and advancing AVs and innovation are mutually achievable goals.

A comprehensive and thoughtful approach to AV development and deployment would include these sensible safeguards:

Minimum Standards for ADS and Foundational Safety Technologies

- Safety standards to ensure that the ADS will "see" and safely respond to all road users, vehicles and infrastructure in the roadway environment (aka a "Vision Test") are elemental.
- Performance standards for safety technologies can save lives now as well as contribute to an automated driving future. These include: automatic emergency braking (AEB) that detects and responds to all road users, vehicles and roadway infrastructure; lane departure warning (LDW) / lane keeping assist (LKA); blind spot detection with intervention; intelligent speed assistance (ISA); occupant detection; and, a system to ensure a driver is sober, aware and capable. The AV will need to see and respond to everyone and everything in the roadway environment, stay in its lane, be aware of other road users before switching lanes or turning, adhere to the speed limit, know if an occupant is in the vehicle and ensure a driver can take over from the ADS at a moment's notice for vehicles equipped with a partial ADS system.

Retain States' Rights to Protect Their Road Users

- States must not be hampered from taking action to ensure safety on their roadways including by establishing requirements to report safety and crash data, to limit operations due to safety deficiencies, to support enforcement of traffic safety laws and to conduct crash investigations.

Collection of and Public Access to Comprehensive Safety Data is Essential

- The National Highway Traffic Safety Administration (NHTSA) established the standing general order (SGO) to require the reporting of safety data for vehicles equipped with a level 2 advanced driver assistance system (ADAS) and an ADS. The SGO is a needed step in the right direction and should be improved to collect new safety data and made permanent.
- States and localities must have access to recent and robust safety data to make determinations on AV operations.

Establish Accessibility Requirements

- While the AV industry has consistently included accessibility and mobility improvements for people with disabilities as a top priority, known and persistent issues including wheelchair securement remain unsolved. Remedies must be required.

Address Safety Considerations for Remote Operators

- AV operations are using remote operators (ROs) and remote assistants (RAs) to overcome deficiencies in their ADS and bolster their operations.
- Information on the scope of ROs / RAs and the safety deficiencies they are addressing is currently undocumented, yet needs to be, to understand the safety and readiness of related ADS.

- Safety issues related to use of ROs / RAs must be identified and safeguards established including but not limited to restrictions on the number of vehicles each RO / RA is managing, limitations on hours of service (HOS), requirements for a commercial drivers license (CDL) and experience operating related vehicles.

Include Workforce Protections

- Workforce issues for certain working drivers must be addressed.

Prevent Mass Exemptions from Federal Motor Vehicle Safety Standards (FMVSS)

- A procedure for exemption (up to 2,500) from FMVSS already exists. Provisions that permit mass exemptions from current FMVSS, particularly in the absence of new standards to ensure the safety of the ADS, are dangerous.

Curb Allowances for Testing and Demonstration

- Under current law, motor vehicle manufacturers can introduce vehicles that do not comply with federal safety standards into interstate commerce for the sole purposes of testing and evaluation.
- Current law should not be expanded to allow more groups to take advantage of this allowance or to monetize the testing period.

Roadway safety must be prioritized in the approach to AVs. On average, 112 people were killed every day on roads in the U.S., totaling nearly 41,000 fatalities in 2023.[1] Early projections for 2024 traffic fatalities remain at a similar historic high level; over 39,000 people are estimated to have been killed that year.[2] The public health crisis on our roadways should not be exacerbated with additional dangers caused by AVs.

Thank you for your consideration of these issues. We respectfully request this letter be included in the hearing record.

Sincerely,

Advocates for Highway and Auto Safety
America Walks
American Academy of Pediatrics
Center for Auto Safety
Citizens for Reliable and Safe Highways (CRASH)
Consumers for Auto Reliability and Safety
Disability Rights Education and Defense Fund (DREDF)
GreenLatinos
Kids and Car Safety
League of American Bicyclists
Northern Virginia Families for Safe Streets
Parents Against Tired Truckers (P.A.T.T.)
SMARTER, Inc. (the Skilled Motorcyclist Association - Responsible, Trained, and Educated Riders, Inc.)
Stopdistractions.org
Trauma Foundation
Truck Safety Coalition

cc: Members of the Committee on Commerce, Science, and Transportation

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1 Traffic Safety Facts Research Note: Overview of Motor Vehicle Traffic Crashes In 2023, NHTSA, Apr. 2025, DOT HS 813 705, (Overview 2023).

2 Traffic Safety Facts: Crash Stats, Early Estimate of Motor Vehicle Traffic Fatalities in 2024, NHTSA, Apr. 2025, DOT HS 813 710 (Early Estimates 2024).