

As a frequent vehicle driver and occasional pedestrian I would like to advise that NHTSA considers open and obvious notice to other drivers of the testing vehicles on the road when conducting ADS safety research by testing and deploying these vehicles. NHTSA requested comment on multiple aspects of this upcoming project and I will focus on the potential factors to take into consideration in designing the pilot program.

Developing a safe pilot research program will benefit society as a whole by reducing the amount of preventable accidents. According to NHTSA, in the United States, one person dies every 50 minutes due to an alcohol-impaired driver.<sup>1</sup> This is an entirely preventable accident that with the help of automated driving systems will save tens of thousands of lives if carefully tested and then implemented. Distracted driving is another preventable type of accident that would be reduced with a safely implemented plan. Distracted driving deaths were at an all-time high in 2015 which isn't surprising with what seems like unceasing texting and phone calls taking place on the road.<sup>2</sup>

I believe that we must find a balance between imposing rules to keep the public safe while allowing for the most efficient and innovative technology to enter this space. Too many rules and regulations will keep technology out because much of it is obviously new and we can't know enough about all of it until it is tested. I am not an expert on ADS vehicles but I am a current student that is interested in the growth of technology and how it can help people access the roads that normally wouldn't, such as those with disabilities. I am a driver, pedestrian, and advocate for innovative but safe advances in transportation.

The potential factor that should be considered in designing a pilot program for the safe on-road testing and deployment of vehicles with high and full driving automation and associated equipment is the blatant advertisement of a testing vehicle. Currently, when I'm driving, I am on notice of 'Student Drivers' sharing the road with me and when I see those vehicles I am more cautious. I believe implementing this rule for ADS vehicles will put other drivers on notice that this vehicle is being tested. Putting a sign on the ADS vehicle with a similar open and obvious

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<sup>1</sup> National Highway Traffic Safety Administration. Traffic Safety Facts 2016 data: alcohol-impaired driving. U.S. Department of Transportation, Washington, DC; 2017 Available at: <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812450> Accessed October 10, 2018.

<sup>2</sup> National Center for Statistics and Analysis. *Distracted Driving: 2015*, in *Traffic Safety Research Notes. DOT HS 812 381*. March 2017, National Highway Traffic Safety Administration: Washington, D.C.

signage like the ‘Student Drivers’ cars will allow these vehicles to be tested with the rest of us while also alerting us to a new and potentially imperfect system sharing the road with us. Although opponents to this idea will argue that other drivers may ‘test’ the vehicle by cutting them off or engaging in dangerous road practices to see how the vehicle performs, I think the percentage of drivers that would engage in that type of behavior is not large enough to avoid testing this beneficial program. According to the findings of a 2014 Study conducted by AAA Foundation, 11.9% of drivers self-reporting on their driving admitted to cutting off another vehicle on purpose.<sup>3</sup> While some drivers do admit to engaging in this type of behavior, I believe that the more common it is for drivers to see this type of vehicle on the road the less intrigued people will be and we will all become more familiar with this type of vehicle sharing our space.

Thank you for taking the time to read my letter and consider my comment. I look forward to the unveiling of the pilot program and seeing technology change the scope of transportation as we know it.

-Miranda Ramedia

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<sup>3</sup> Prevalence of Self-Reported Aggressive Driving Behavior: United States, 2014. <https://aaafoundation.org/wp-content/uploads/2017/12/Prevalence-of-Aggressive-Driving-2014-FS.pdf>. Accessed October 10, 2018.