



November 26, 2018

The Honorable Heidi King
Deputy NHTSA Administrator of the USDOT
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590

Dear Administrator King:

On behalf of the University of Michigan's Mcity, I am writing in response to Docket No. NHTSA-2018-0092, in which the National Highway Traffic Safety Administration seeks comments about a proposed Pilot Program for Collaborative Research on Motor Vehicles With High or Full Driving Automation. Mcity is a public-private partnership focusing on research and early deployment of connected and automated vehicles (CAVs.)

The proposed pilot program would be a major step forward for deployment of level 4 and level 5 automated vehicles. Such a program would require significant effort and resources to organize, including thoughtfully managing expectations for data sharing among multiple entities. Mcity believes the most effective way to manage the proposed pilot is through a public-private partnership. Potential benefits include access to third-party expertise and resources, and fewer concerns about data sharing, among others.

Mcity supports the approach mentioned in *Preparing for the Future of Transportation: Automated Vehicles 3.0*, released by the U.S. Department of Transportation in October, and echoed in the Advance Notice of Proposed Rulemaking: Participating vehicles should successfully complete lab testing to ensure their basic competence before being allowed in the pilot and deployed on public roads.

Mcity has developed a concept lab testing procedure, known as the Mcity ABC Test, which combines accelerated testing with vehicle behavior competency and corner case testing. We would be pleased to share the concept procedure with NHTSA to support the proposed pilot program.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Peng'.

Huei Peng
Director of Mcity
University of Michigan, Ann Arbor
hpeng@umich.edu
(734) 936-0352