NAFA Fleet Management Association

Fleet Solutions for Fleet Professionals

December 10, 2018

Deputy Administrator Heidi Renate King
National Highway Traffic Safety Administration
U.S. Department of Transportation (DOT)
Docket Management Facility
1200 New Jersey Ave. SE, West Building
Ground Floor, Room W12-140
Washington, D.C. 20590

Submitted via electronic submission: http://www.regulations.gov

Re: Docket No. NHTSA-2018-0092,
Advanced notice of proposed rulemaking
Pilot Program for Collaborative Research on Motor Vehicles with High or Full Driving Automation
Federal Register No: 2018-21919

Dear Deputy Administrator King,

I am writing on behalf of the NAFA Fleet Management Association (NAFA) to respond to the National Highway Traffic Safety Administration's (NHTSA) Advance Notice of Proposed Rulemaking (ANPRM) and Request for Comments on matters related to a pilot program for collaborative research on motor vehicles with high or full driving automation issued on October 10, 2018. NAFA is in strong support of the development of a pilot program to advance the safe and timely adoption of automated vehicles in the United States. NAFA believes that automated vehicle technology has the potential to significantly improve roadway safety and efficiency.

NAFA is the association for professionals who manage fleets of sedans, public safety vehicles, trucks, and buses of all types and sizes, and a wide range of military and off-road equipment for organizations in North America and across the globe. NAFA's members are responsible for the specification, acquisition, maintenance, repair, fueling, risk management, and remarketing of more than 4.6 million vehicles, including in excess of 1.2 million trucks, that drive over 84-billion miles each year.

General Comments

Developers of automated vehicle technologies have made significant strides in creating systems that could potentially eliminate or greatly reduce the primary cause of on-road accidents, human error. NHTSA's continued efforts to address policies related to the testing and deployment of these advanced technologies are critical to ensuring they are cultivated in a way that does not jeopardize current levels of motor vehicle safety. Without proper governmental oversight and public safety assurances to minimize testing faults, the fate of automated technologies will become more vulnerable to the opinions of a public that still largely views these technologies with apprehension[1].

NAFA believes that a pilot program that allows for exemptions from the Federal Motor Vehicle Safety Standards ("FMVSS") for light-duty motor vehicles with high and full driving automation that do not have traditional designs that may not be FMVSS compliant will foster testing innovation among both traditional and non-traditional manufacturers. It is important that the proposed pilot program be accessible and incentivize participation from a wide variety of stakeholders who could contribute to the advancement of these revolutionary technologies. Provisions in the pilot that would allow for full deployment of non-traditional motor vehicles will greatly advance the science and research behind these technologies and hopefully accelerate the pace at which these technologies can come to the market for consumers. While these advanced technologies will require the development of new motor vehicle policies and regulations, a potential pilot program will be a valuable point of reference for regulators as they work on these issues in the future to ensure that automated vehicles are operated safely.

NAFA recognizes that many automated vehicle technology developers are testing their systems within a fleet structure that looks towards leveraging the technology for commercial applications. NHTSA should consider how it may include provisions in a pilot program to develop partnerships between automated vehicle technology developers and existing public and private fleets as a means for testing and deploying this technology within the scope of the pilot. Fleets are likely to be some of the first adopters of advanced automated vehicles when they become publicly available, given the many potential benefits they could bring to a fleet compared to a traditional automotive consumer. Fleets are already leaders in adopting new vehicle technologies such as advanced driver-assistance systems, advanced telematics, connectivity systems, and non-traditionally fueled vehicles. Incorporating fleets into a pilot program will generate data that is extremely applicable to real-world scenarios and help guide developers as they design and refine their technologies.

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[1] American Automobile Association (AAA). (2018, May 22). *American Trust in Autonomous Vehicles Slips*[Press release]. Retrieved from https://newsroom.aaa.com/2018/05/aaa-american-trust-autonomous-vehicles-slips/

Specific Comments

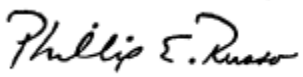
Q1: NHTSA should consider the various stakeholders who could be partners with automated vehicle technology developers as it designs the structure of a pilot program. Encouraging participation and partnerships between developers and fleets would generate significant amounts of data that would be applicable to commercial and non-commercial use of automated vehicles.

Q2: It is essential that if NHTSA were to create a pilot program that the data collected is reflective of the many different driving environments within the United States. This would need to entail testing and deployment in many different locations, at different times of day, with different routes with variable road conditions. NHTSA should encourage the scope of this program to be as large and comprehensive as possible in order to facilitate the generation of data and results that are most applicable to real-world scenarios.

Q15.k: Control group data would be an important element in determining the efficacy of automated vehicle deployment. Working with fleets as partners in the pilot program would provide NHTSA with comparable data for automated vehicles and non-automated vehicles subject to identical routes and variables.

We appreciate the opportunity to provide these comments and NAFA and its members look forward to providing NHTSA with additional information during the rulemaking process. Thank you again for your consideration on this critical issue. If you or your staff have any questions or need additional information, please feel free to contact me or Patrick O'Connor, NAFA's U.S. Legislative Counsel at 703/351-6222.

Sincerely,



Phillip E. Russo, CAE
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