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December 7th, 2018

Heidi Renate King
Deputy Administrator, National Highway Traffic Safety Administration
U.S. Department of Transportation
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC

Re: Request for comment regarding Pilot Program for Collaborative Research on Motor Vehicles With High or Full Driving Automation.

Docket Number: NHTSA-2018-0092

Dear Ms. King:

Cognata delivers a simulation software platform to autonomous vehicle (AV) developers that enables the validation of automated driving systems (ADS) virtually; prior to, and in conjunction with, physical testing. As the provider of a commercially-deployed solution, having worked with well-known AV developers, Cognata understands the challenges of ADS development and is experienced in the testing and measurement of safety performance.

Cognata commends Secretary Chao and the Department for the advances reflected in AV 3.0. We are especially inspired by the attention given to technology evaluation methods, performance-oriented standards, and transparency and public confidence.

Cognata appreciates and accepts the Secretary's challenge to innovators, to help address public concerns about the safety of automated vehicles. We commend her efforts in creating, fostering, and continuing a national discussion about the future of safe automated transportation.

We ask the Department to consider the following specific comments:

- **Safety Analysis for Exemption Petition Assessments:** Cognata believes that exemption from existing standards continues to be a tool well-suited for the introduction of new technologies while, in parallel, standards are amended and created through rulemaking. We further believe that the exemption process can be streamlined to accelerate decision-making while maintaining the current technical and trusted data-driven structure. Cognata urges the Department to recommend, and consider the results of,

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objective, repeatable, and transparent tests performed in simulation for the measure and assessment of vehicle safety. Finally, Cognata believes that transparency and communication of performance-oriented test results have significant potential to increase public confidence in automated driving systems.

- 3rd Party Validation: Cognata supports the development of an independent validation process to ensure the safety of automated driving systems and testing protocols. We further believe that objective, repeatable, and transparent tests performed in simulation should be a recommended and considered an accepted method of performing validation.
- Pilot Program Design: Cognata believes that controlled-environment testing, namely simulation and proving grounds, are critical components of a responsible multi-platform testing strategy. We further believe that, when closely coupled, these testing platforms have the potential to accelerate safe testing of known use cases and discovery of new use cases. We support the development of a Federal benefit to foster integration and closer collaborative research by these stakeholders.

I hope the foregoing comments are useful to you and the Department as you continue to develop guidance and activities related to vehicle automation. Cognata stands ready as ever to be a constructive partner in advancing the safe development of these transformative technologies.

Sincerely,

Heikki Laine
VP, Product at Cognata