

May 20, 2019

Heidi King  
Acting Administrator  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Ave  
Washington, DC 20003

**Reference:** NHTSA-2019-0016 Notice of receipt of petition for temporary exemption; request for public comment.

Dear Ms. King,

The Intelligent Transportation Society of America (ITS America) supports General Motors request for exemptions in reference to its “Zero-Emission Autonomous Vehicle,” an all-electric vehicle with an Automated Driving System (ADS), from part of each of 16 Federal Motor Vehicle Safety Standards (FMVSS).

GM's petition seeks a two-year exemption for the production and deployment of 2,500 or fewer Zero-Emission Autonomous Vehicle (ZEAV) per year. The GM petition seeks exemptions from Federal standards that in most cases cite requirements for direct or indirect human driver interaction with specific vehicle controls or status indicators.<sup>1</sup> GM's ZEAV is built from the mature Chevrolet Bolt platform. Furthermore, the ZEAV would be deployed in a GM rideshare program, where automated operations will be limited to specific conditions (road geometry, surface, weather etc..) and pre-determined and surveyed routes to provide higher levels of safety and safety assurance.

ITS America is committed to work with industry, regulators, infrastructure operators and safety advocates to build a foundation for the deployment of automated vehicles. We seek to build public confidence by achieving broad industry participation in the NHTSA policy, guidance and standards development process. We see exemptions, and the notice-and-comment process, as an important process to engage industry, states and local authorities, safety regulators, and advocates to address their concerns about safety such as testing, as well as to help them in establishing their own processes that would help the transition from testing to larger-scale deployment. ITS America has long advocated for changes or clarifications to Federal Motor Vehicle Safety Standards or other authorities to support new systems such as automated driving systems, and other technologies that enhance visibility, conspicuity, and other key performance factors to improve motor vehicle safety.

ITS America believes that mobility, accessibility, security, privacy, and sustainability are interdependent and important factors to address along with motor vehicle safety. In particular, ITS America agrees with

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<sup>1</sup> A petition requesting a *Temporary Exemption from Motor Vehicle Safety and Bumper Standards* is justified on the basis that an exemption from a FMVSS would facilitate the development or field evaluation of a new motor vehicle safety feature providing a level of safety at “least equal to the level of safety required by the standard.” (49 CFR part 555)

General Motors that granting this exemption would encourage the auto industry development and introduction of zero-emission autonomous vehicles, enhancing sustainability. Also exemptions and modifications of federal motor vehicle standards to support driving automation may in the future provide added flexibility to designers to implement concepts that enhance accessibility of future automated vehicles for people with disabilities.

In a new technological era where automated vehicles may transform mobility broadly, in particular in reference to ride sharing, ITS America is supportive of GM's efforts to combine ridesharing and automation with a focus on safety. ITS America created the Mobility on Demand (MOD) Alliance to help determine what the future of mobility should look like, striving for a world that is safer, greener and smarter. The MOD Alliance brings public, private, and academic sector stakeholders together to promote the benefits of MOD and address obstacles hindering its development.

Automated and connected vehicle technologies have the potential to reduce or eliminate the tragic loss of life that happens every day on U.S. roadways. ITS America supports General Motors for its ongoing commitment to safety and innovation and is proud to have the company as a member. We look forward to a continued collaboration as we pursue our vision of a better future transformed by intelligent mobility - one that is safer, greener and smarter.

Thank you for your consideration.

Sincerely,

/s/ Steven H. Bayless

Steven H. Bayless

Vice President, Public Policy and Regulatory Affairs  
Intelligent Transportation Society of America