



MAY 20, 2019

BY ELECTRONIC SUBMISSION

The Honorable Heidi King
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
West Building
Washington, DC 20590

RE: DOCKET # NHTSA-2019-0016

Ladies and Gentlemen:

CTIA¹ provides these comments in support of the Petition for Temporary Exemption from Various Requirements of the Safety Standards for an All-Electric Vehicle with an Automated Driving System (the “Safety Petition”) filed by General Motors, LLC (“GM”). The Safety Petition will help accelerate the development, testing and deployment of self-driving cars without traditional operational controls. Automated vehicles will save lives, increase access to mobility, and deliver wide-ranging economic benefits for the country. Wireless technology, including 5G, will enhance these benefits through fast, high-capacity connectivity among vehicles, infrastructure and road users. We are encouraged that the Department of Transportation and the National Highway Traffic Safety Administration (“NHTSA”) are evaluating this request and applaud GM for its commitment to developing and advancing lifesaving technology.

¹ CTIA-The Wireless Association® (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to live a 21st century connected life. The association’s members include wireless carriers, device manufacturers, and suppliers, as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.



Self-driving vehicles hold promise across a broad range of societal benefits, the most important of which is safety. Simply put, self-driving cars will reduce car crashes and save lives. Nationwide, more than 37,000 people died in 2017 due to car crashes and more than 90% of these deaths are caused by human error or behavior. Self-driving vehicles will save lives by eliminating errors such as distracted, drunk or drowsy driving.

Critically, self-driving cars will also enhance mobility by creating new modes of transportation for Americans who, for various reasons, do not own or operate cars. For people with disabilities and some senior citizens, this will mean greater independence and the ability to travel to a job, run errands, or simply visit a friend or loved one. In communities that lack or are underserved by public transit, self-driving technology can also help spur economic activity via increased access to mobility.

Wireless technology will ensure that the benefits of self-driving cars, like those designed into the zero-emissions automated vehicle that is the subject of the Safety Petition, will reach road users, including other vehicles, pedestrians and cyclists, at scale. CTIA's members are deploying 5G networks that will offer speeds up to 100 times faster than today's services, enable 100 times the number of devices, and will be five times more responsive than today's networks.² As the Administration recently recognized, with these advancements, "wireless technologies...can unleash innovation broadly across diverse sectors of the economy and the public sector."³ 5G will drive transformational improvements in day-to-day life and will support many industries, including transportation. For these reasons and more, 5G leadership is critical to "our economic, national security, science, safety, and other Federal mission goals now and in the future." U.S. wireless providers are expected to invest approximately \$275 billion in 5G-related networks, creating three million new jobs and adding \$500 billion to our economy.⁴

² See *The Race to 5G*, CTIA, <https://www.ctia.org/the-wireless-industry/the-race-to-5g>.

³ Presidential Memorandum on Developing a Sustainable Spectrum Strategy for America's Future, Sect. 1 (issued Oct. 25, 2018), <https://www.whitehouse.gov/presidential-actions/presidential-memorandum-developing-sustainable-spectrum-strategy-americas-future/>.

⁴ For additional details on how America's wireless industry is working to ensure U.S. global leadership in 5G, and key policy objectives, see <https://www.ctia.org/national-spectrum-strategy> (April 2, 2019).



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To truly unlock the benefits of self-driving cars, however, updates to existing vehicle safety standards are needed. Until then, the Safety Petition represents a watershed moment for U.S. leadership in the development of critical lifesaving technology and the advancement of transportation innovation. We urge NHTSA to approve GM's petition. Additionally, we urge the Administration to initiate a rulemaking to update current vehicle safety standards to incorporate highly automated vehicles.

As NHTSA considers the Safety Petition and updated guidance and rulemaking for the development, testing and deployment of self-driving cars, we hope you will support innovation, enable the safe development of this technology across the country, and ensure the U.S remains a leader in this critical area.

Respectfully submitted,

By: /s/ Jackie McCarthy
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