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

Re: Docket No. NHTSA-2019-0016

Dear Deputy Administrator King:

I write today on behalf of the American Council of the Blind to share our support for General Motors' Safety Petition that will help accelerate the development, testing, and deployment of self-driving cars without traditional operational controls.

The American Council of the Blind is one of the nation's largest grassroots consumer organizations for people who are blind and visually impaired. With affiliates across the country, ACB strives to secure opportunity and independence for the millions of Americans who are blind and visually impaired, building a brighter future. Moving closer toward fully autonomous vehicles gets us all closer to greater freedom of mobility, particularly for those who lack full access to their community due to blindness or other disabilities.

Critically, self-driving cars will enhance mobility by creating new modes of transportation for Americans who, for various reasons, do not own or operate cars. Many Americans live in communities that lack public transportation systems. But, with the advent of autonomous vehicles, for people with disabilities and some senior citizens, this will mean greater independence; it will unleash 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, the blind community will be able to travel to once unreachable locations in a fast and convenient manner. Relatedly, with the increase of community involvement, self-driving technology can also help spur economic activity.

Self-driving vehicles hold promise across a broad range of societal benefits, the most important of which is safety. 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.

To truly unlock the benefits of self-driving cars, however, updates to existing vehicle safety standards are needed. Until then, the GM petition represents a watershed moment for U.S. leadership in the development of critical lifesaving technology and the advancement of transportation innovation. We respectfully urge the National Highway Traffic Safety Administration to [approve/move forward with] GM's petition. Additionally, we also urge the Administration to initiate a rulemaking to update current vehicle safety standards so as to incorporate highly automated vehicles.

As NHTSA considers this petition and updated guidance and rulemaking for the development, testing, and deployment of self-driving vehicles, we hope you will support innovation, enable the safe development and deployment of this technology across the country and ensure the United States remains a leader in this critical arena.

Thank you for your attention to this matter.

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Sincerely,

Eric Bridges

Executive Director, American Council of the Blind