

## Comment from Ibrahim Toure

Nuro, Inc. should be permitted to operate Electric Vehicles with autonomous (human driverless) driving systems within predesignated operating areas, as typically described by SAE Level 4 autonomous driving system requirements.

Nuro, Inc. should be required to coordinate with, and provide appropriate training (including emergency response, passenger assistance, fire safety) to all affected agencies and parties within the predesignated area. Public notice, public instruction regarding interactions with the subject autonomous driving systems, and open public comment should be made available to all occupants of the predesignated area by public notice, print advertisement, and online comment webpage at least 60 days prior to initial deployment.

Nuro, Inc. should be required to bear all liabilities typically ascribed to a "driver" in addition to manufacturer's liabilities. The risks of this technology may be mitigated by proper training of affected agencies, information and involvement of the affected public, as well as continuous system improvement based upon user and public feedback.

Nuro, Inc. should be required to provide public and agency access to relevant statistical real time data, such as number of interventions/disengagements (a human operator was required to assume control of the autonomous driving system directly or remotely), accident and incident reports, subsystem failures (even if the failure did not affect operation), etc.

The risks of this technology must be quantitatively weighed against the risks of alternative human operated transportation modes.

This technology has the potential to provide many socioeconomic benefits including simpler and more cost effective and timely transportation of goods, the elderly, disabled persons, and all persons who do not possess a valid drivers license and registered vehicle or affordable access to a vehicle driven by others.