Dockets #NHTSA-2019-0016 and #NHTSA-2019-0017

2019-Mar-15

Dear Sir,

Today NHTSA made a request for public comment which was summarized by Bloomberg
News as "ask[ing] the public if robotic cars should be allowed on streets without steering
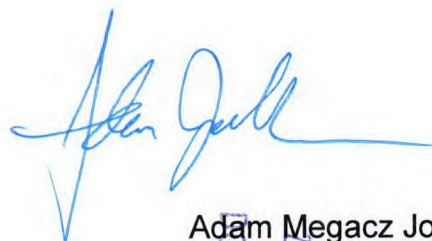wheels or brake pedals".

As a microchip designer and software engineer with a Ph.D. in Computer Science from UC
Berkeley I feel qualified to comment on this matter.

NHTSA's duties require that it <u>MUST NOT</u> allow these vehicles on our roads.

When it comes to dealing with <u>unexpected</u> circumstances the human mind is, by far, the most
advanced system we know of. This will be the case for as long as humans are hired to
program computers. There is no need to reconsider this question until all the programmers
are unemployed. I don't expect that to happen anytime soon.

It is true that machines can sense things that humans cannot see and can react faster than
humans can. This does not mean that machines make good drivers. It means that machines
make good systems for augmenting human drivers – systems like ABS brakes and radar
proximity warnings.

Why are we considering autonomous cars when don't yet have autonomous freight trains?
Piloting a freight train is a vastly simpler problem than piloting a car, for the simple reason that
trains don't require steering. At minimum NHTSA should forbid driverless cars until the
majority of the nation's freight trains have been operating without any human input (even in
emergencies) for several years.

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