

Comment from Seth Chalmers, PE

GENERAL COMMENT:

I am amazed at the development of advance driver assist systems (ADSS) for vehicles. I believe the focus of USDOT, FHWA and especially NHTSA needs to be doing everything it can to help promote and focus industry, state governments, local governments and the public on ADSS and the benefits that enables now and in the future. This is where the majority of our resources and attention needs to be. Keep an eye on the future and do what we can to plan and provide for it. But do not let it distract from the here and now. The here and now is those systems that are going into vehicles that folks are buying now and will be buying in the next ten years.

Hence we need to make regulations and enable infrastructure that helps ADSS become more affordable, reliable and more widely deployed as soon as possible. Telsa and the higher end vehicle makers should not be dominating this. GM, Ford, Kia, Toyota, Honda, VW is where it is. These are the vehicles most folks can afford to buy either new or used. Plus, serious consideration needs to be given to promote after market improvements to existing vehicles that are affordable and practicable for folks to retro-fit on their vehicles to achieve various safety and other driver error prevention effectiveness improvements.

I believe there is still much to learn and develop regarding artificial intelligence (AI) that is going to hinder full automatic driving vehicles a lot in the next 5 to 10 years. The reoccurring source of error for AI is ambiguity. The ambiguity that humans can deal with in seconds, but AI system might struggle with or completely shut down on or worse yet do the totally wrong thing. Therefore, until AI can deal with this and can prove it can deal with this without hurting or killing someone (e.g. Boeing, Telsa, Uber are great bad examples) lets hold it at bay. AI vehicles that drive in the public right of way need to have the means to allow immediate manual control if and as needed. Plus, they need to be monitored by humans that understand AI limitations and have actually been trained on that subject and will be attentive and rational about it.

I do approve the approach USDOT is taking on this issues. The national dialogues were very well done and I do appreciate the manner and the people who did these. Being thoughtful and careful and developing good information prior to making policy decisions is good for our Country!!