

Robert Passmore  
Assistant Vice President  
Personal Lines Policy

July 29, 2019

David Hinds, Director  
Office of Crash Avoidance Standards  
U.S. Department of Transportation  
Room W12-140  
1200 New Jersey Avenue S.E.  
Washington, DC 20590-0001

RE; Docket NHTSA -2019-0036 Removing Regulatory Barriers for Vehicles with Automated Driving Systems

Dear Mr. Hinds,

Automobile insurers consistently advocate for highway safety improvements, and the American Property Casualty Insurers Association (APCIA) believes that the introduction of advanced vehicle technology represents one of our greatest opportunities to improve highway safety. However, for the technology to realize its potential, the regulatory framework for automated vehicles should preserve, if not improve upon, the current level of safety.

APCIA is composed of over 1,200 member companies and 330 insurance groups, whom together write 70 percent of the commercial auto insurance in the United States. APCIA represents the broadest cross-section of home, auto, and business insurers of any national trade association. APCIA members represent insurers of all sizes, structures, and regions, which protect families, communities, and businesses in the U.S. and across the globe. While improvements in vehicle technology has made vehicles safer, and holds great potential for the future, we urge the Department to continue to focus on the auto safety challenges that face us today such as distracted driving, excessive speed as well as drug and alcohol impaired driving. Addressing those issues remains critical to reducing accidents, injuries and deaths on the nation's roads.

Secretary Chao noted in her cover letter to the Departments 2018 guidance "Automated Vehicles 3.0, Preparing for the Future of Transportation", that it is the Departments intent to "prioritize safety" as one of its guiding principles for the regulation of automated vehicles. More specifically, the Department said in its 2017 guidance, "Automated Driving Systems 2.0, A Vision for Safety", the occupant protection system should "maintain its intended performance level" in the event of a crash.

While commenting on specific testing and certification standards is best left to other stakeholders, APCIA believes that any changes to the Federal Motor Vehicle Safety Standards (FMVSS) should be rare and ensure that the current levels of safety and crashworthiness are maintained, if not improved upon. The reasons for the approval of the exemption should always be made public, providing as much information supporting the rationale as possible, while recognizing the intellectual property rights of the manufacturer/developer. This level of detail is important to insurers and safety researchers in the event of a crash, as well as promoting greater public understanding of the technology.

We look forward to working with the Department to reduce accidents on our roads today and in the future. Please contact me if you have any questions about these comments, or if we can be of any assistance on auto safety or automated vehicle issues.

Sincerely

A handwritten signature in black ink, appearing to read 'Robt C. Passmore', written in a cursive style.

Robert C. Passmore