Comment from Donald De Laria

It would be my hope that the FMCSA and NHTSA consider the following with respect to automated driving and autonomous vehicles. I believe there can be a place for automated vehicles in controlled environments such as ports and other environments where distractions and unforeseen circumstance can be minimized. I also believe that autonomous vehicles operating on public highways poses a number of challenges that have yet to be solved, including:
Who is at fault if an autonomous truck is in an accident?
Who is liable for damages, the owner of the truck, the financing company, the technology system provider, the dealership that sold the truck, the driver, the owner of the carrier, the insurance company? How can we possibly expect to regulate this.
The technology continues to improve and evolve but their have been over 15 instances of vehicles using Lidar technology of slamming into and even accelerating into the back of stopped emergency vehicles because the system has been trained to ignore stationary objects near the road (like road signs).
What happens when a self driving vehicle causes and accident but is not involved in it. Will it stop? How do you conduct roadside inspections of autonomous vehicles? Who will be held responsible?
Has anyone see an autonomous vehicle operate in the rain, in snow or at night? How is the performance different?
Also envision a scenario where, because of the actions of another vehicle (or animal), the driver now must decide between driving into the ditch or sideswiping a bus full of schoolchildren. ONLY HUMANS will be able to make these microsecond judgement decisions based on years and years of training an experience. How will an autonomous system reconcile that its better to hit the deer and avoid loss of other human life. Then what if it mistakes a deer for a human. The consequences of autonomous driving are very real and very, very serious. As a result, I believe that a phase approach where vehicles are allowed into highly controlled environments and then gradually allowed into more public domains makes the most sense. The programmers will claim that everything works great, right up until someone is killed.

For those who argue these systems can augment human operators and provide an extra margin of safety, I offer the case of the testing driver that was paid to watch and take control of a autonomous vehicle the company was testing. It was in fact, their only job - to intervene, and the vehicle still hit and killed a pedestrian. Add to that the misuse by numerous operators of Tesla's technology who have read the paper, worked on their computer and even had sex, while a "self driving" car was driving. You put anything that resembles a self driving system into the hands of the general public and they will mis-use it within hours.

For the last 20 years (at least) commercial airplanes have had the technology to autonomously taxi from the gate to the runway, takeoff, fly and land and then taxi to the arrival gate. Home may pilots sit in the front of he airplane...TWO! And that's an environment that an be highly controlled.