



We're leading the movement to build a Bicycle-Friendly America for Everyone

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National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

August 14, 2019

Dear Docket Clerk:

The League of American Bicyclists (League) is pleased to provide comments on the U.S. Department of Transportation's "Removing Regulatory Barriers for Vehicles with Automated Driving Systems" Advance Notice of Proposed Rulemaking (Docket Number NHTSA-2019-0036). The League is a membership organization dedicated to Building a Bicycle Friendly America for Everyone and has over 350 advocacy organization members who advocate for the safety of people who bike and walk in all 50 states.

The League has repeatedly stressed the need for testing of Automated Driving Systems (ADS) for their ability to identify, recognize, and safely react to people biking, walking, and using other mobility devices. The United States has fallen behind other jurisdictions in testing technology for the safety of people biking and walking, with automated emergency braking systems being tested by EuroNCAP for pedestrian and bicycle safety, but no similar testing occurring at NHTSA. It is our belief that testing should be comprehensive, public, and proactive to ensure that vehicle technologies are safe and that consumers can choose the safest vehicles for themselves and others. Any consideration of revising FMVSS should also include consideration of more comprehensive testing that will build trust in automated vehicles.

The League appreciates USDOT's efforts to facilitate the safe and timely adoption of automated vehicles. We believe that automated vehicles have the potential to improve the safety of all people who use our roadways. A proactive approach is necessary now so that we do not have to wait for statistics on the people killed or seriously injured to determine whether these technologies have difficulty seeing people biking or walking, people in wheelchairs or younger people, people of different skin tones or facial characteristics, or other personal characteristics that might make these systems not safe for all.

The League appreciates the opportunity to provide these comments and looks forward to working with NHTSA on the safe deployment of automated vehicles. Please contact me at ken@bikeleague.org if you have any questions.

Sincerely,

Ken McLeod
Policy Director