

Comment from Angela Castro

Safety is always at the forefront of RTCs innovation initiatives. We also understand there is an element of controlled or calculated risk that we must take to advance more desirable & impactful mobility solutions for the future. The NHTSA FMVSS establishes the necessary regulations and controls to ensure a level of consistency and compliancy in automotive engineering to confirm safety. It is encouraging to see that NHTSA is recognizing the need to adjust regulations to allow for innovation to continue on a larger scale for ADS. Technology is rapidly changing and maturing. Supporting policies and regulations need to be in alignment with the speed these technologies emerge (like ADS) and change to allow demonstration & progression while also maintaining safety. We believe in the importance of connecting people to opportunities and services through multiple modes of transportation. ADS presents great potential in reducing traffic incidents, minimizing congestion especially when used as a shared service, and establishing independence & creating access to community, services and opportunities that certain populations may not have today. We advocate ADS in small deployments with more controlled scenarios to prove out the tech maturity. And over time, scale the deployment to present more complex scenarios. The regulations need to provide for this type of approach, experiencing a variety of ADS solutions, so we can continue to evolve.

For example, there are modifications that can be made to regulations within NHTSA that will enable AV shuttle OEMs to receive the necessary waivers to operate on the roads which are viable deliverables associated with federally funded projects. The nature of AVs regardless of the funding source should be considered a demonstration until the technology is proven to be mature enough. It is through small deployments (demonstrations) that we learn and grow. With a demonstration classification, there could be a subset of the FMVSS that is modified to fit the unique build, design and configurations of AVs while still governing the safety necessary on the roads.