

## Gregory Stucky - Comments

There are 5 levels of ADS, according to engineers:

Level 0 The vehicle doesn't drive itself

Level 1 The vehicle steers or controls speed, but not both

Level 2 The vehicle is essentially able to navigate one lane of a highway by itself

Level 3 The vehicle drives with sporadic request for the driver to intervene

Level 4 The vehicle can drive itself unaided in good weather on well paved roads

Level 5 The vehicle drives itself anywhere, anytime

It would be very simple to define all ADS with a more legally binding variation of these, where anything without a steering wheel is Level 5, a steering wheel only meant for occasional or optional use is Level 4, and most everything else is Level 3.

As it stands, almost everything even on the road is Level 3 or lower. Attributing liability is one of the largest hurdles to moving to Level 4, but without any intervention it's likely that a lawsuit will land the precedent solely on the "operator", and that will carry to Level 4 and 5, even if it is unavoidable. The liability should be held by jointly the operator and organization that authorized the vehicle, proportional to that party's involvement in each specific incident.

Further, presuming a computer to be an operator is a bit inaccurate, since it is simply a computer following instructions. The creator of the instructions should be liable, but most computer programmers don't understand driving to the extent required to be prepared for it. I propose requiring a type of CDL for the individuals who work on the project and trace any event back to the line of code written that created the incident.