



January 10, 2020

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The Honorable Elaine Chao
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Chao:

The Association for Unmanned Vehicle Systems International (AUVSI) applauds you for the establishment of the Non-Traditional and Emerging Transportation Technology Council (Council). We believe the Council will be successful in addressing some of the regulatory hurdles that can stagnate the deployment and integration of new and important technologies into our ever-changing transportation system. We are excited to see what the Council produces in terms of best practices going forward to help the Department keep pace with the development of new technologies and that they are utilized to their fullest extent.

AUVSI is the world's largest non-profit organization dedicated to the advancement of unmanned systems and robotics. We represent corporations and professionals from more than 60 countries that are involved in industry, government, and academia. AUVSI's primary markets span the defense, civil, and commercial industries. Unmanned systems represent an expansive market within the transportation system, and it is our mission to ensure all types of unmanned systems and robotics companies that work with us have access to the resources they need to be successful in such a highly competitive industry.

A few matters we ask that the Council consider discussing in upcoming meetings are delineated below. For background, our membership at AUVSI includes a significant number of Unmanned Maritime Systems (UMS) companies, as well as Unmanned Aircraft Systems (UAS) companies. Those companies are part of either our UMS Advocacy Committee or the UAS Advocacy Committee, and in some cases, both.

In the context of these comments, we would like to focus on the UMS Advocacy Committee and its recommended priorities for the Council. The UMS Advocacy Committee has undertaken a campaign over the last year to educate lawmakers on Capitol Hill and agency officials in the Executive Branch, and their staffs, on the progress the industry is making in the development of UMS technology. Our engagement and education have been very well received in the dozens of meetings and briefings we have conducted.

UMS face considerable hurdles in broad deployment. AUVSI believes this can be addressed in part by developing curriculum at the nation's maritime academies to adequately train seafarers for the next



generation of UMS. An important first step to enable new and emerging UMS technologies would be the United States Maritime Administration incentivizing such curriculum at the academies.

Additionally, it is critical that the Council explore the regulatory structures currently being developed for autonomy and UMS by the International Maritime Organization (IMO). Due to the inherent international nature of commercial shipping, the work that is already being conducted around the globe will provide a basis for domestic regulations and serve as a springboard for expediting further rulemaking and system integration.

AUVSI has spent much of the past year working on Arctic issues to demonstrate the feasibility of integrating UMS into high latitude operations. The AUVSI UMS Advocacy Committee has briefed congressional offices, Coast Guard officials, and provided amendments to legislation to ensure that UMS is a part of expanded Arctic operations for both defense and commercial stakeholders.

The AUVSI UMS Advocacy Committee is a preeminent industry voice influencing acquisition policies and processes. We are proud of the success that we have been able to accomplish, and it is our goal to continue to work with the federal government to help facilitate the growth of UMS. We believe collaboration by the public and private sectors is key to integrating advanced automation maritime platforms into the domestic market and continuing to develop the future of the UMS workforce. We understand that this Administration and the Department of Transportation writ large are focused on addressing either onerous or antiquated regulations that stifle innovation rather than foster it. We are committed to helping the Administration achieve that goal and to helping the Council identify and resolve jurisdictional and regulatory gaps and discrepancies.

AUVSI is dedicated to serving as a resource for the Council as meetings are held on UMS policy. Our goal is to support the continued vitality of our industry and to equip this Administration with the knowledge and expertise necessary to help advance UMS technology throughout the country. We, again, would like to sincerely thank you for your call to create the Non-Traditional and Emerging Transportation Technology Council and appreciate your consideration of these pressing issues.

Sincerely,

Michael J. Smitsky, Esq.

Senior Manager, Advocacy and Government Relations