

## Comment from Mark Cipolone

March 19, 2020

I am writing regarding the US Department of Transportation's request for comments on the agency's revised plan for federal automated vehicle policy: "Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0" (AV 4.0). [Docket No. DOT-OST-2019-0179]

The Executive Summary of AV 4.0 states that one of the major areas of concern of the Federal Government, and hence the report, is to "Prioritize Safety." However, review of AV 4.0 indicates that the vast majority of the report is devoted to the benefits of autonomous vehicles, the promotion of efficient markets, and the Federal Government's coordinated efforts to promote autonomous vehicles. The absence of discussion about safety is disappointing.

While I am favorable to the concept of responsible autonomous vehicles, as a licensed professional engineer, I am concerned that AV 4.0 appears to focus more on assisting manufacturers than on ensuring safety. I believe manufacturers have a conflict of interest in the development of autonomous vehicles and that manufacturers should not be allowed to self-certify their work. My engineering experience indicates that people and firms make mistakes, take short-cuts, and occasionally cheat, and the proposed rules need to address these issues in detail.

The Federal Government should be more involved in performing safety assessments, which would be paid for by the manufacturers. The assessments could also be performed by other qualified parties, such as professional engineers who are bound by ethics and statutes to hold the safety and well-being of the public paramount in every assignment.

Sincerely

Mark R. Cipolone, PE  
Woodbury Heights, NJ 08097

cipolone2000@yahoo.com