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March 25, 2020

Mr. Finch Fulton
Deputy Assistant Secretary for Transportation Policy
US Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590

RE: Docket No. DOT-OST-2019-0179

Dear Mr. Fulton:

The Texas Department of Transportation (TxDOT) welcomes the opportunity to provide the following comments on the document, *“Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0”* (AV 4.0):

I-2: Protect Users and Communities: Emphasize Security and Cybersecurity

Currently, NHTSA’s most powerful tool to preserve roadway safety is via recalls. However, in a cyberattack, the recall process may be too lengthy to be effective before severe damage occurs. As such, the U.S. Government should review NHTSA’s powers and consider expanding them to act immediately in some cases to suspend vehicles in response to a cyberattack.

II-5: Promote Efficient Markets: Remain Technology Neutral

Throughout the AV 4.0, the U.S. Government affirms its commitment to remaining technology neutral. However, recent activity by the FCC suggests that the FCC will determine a communication standard for connected vehicle technology, not the free market. TxDOT encourages a review of the FCC’s activities to ensure they are in line with the principles set forth in AV 4.0.

If you have any questions regarding this submission, please feel free to contact me at (512) 305-9508 or Darran.Anderson@txdot.gov.

Sincerely,
DocuSigned by:

Darran Anderson

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Darran Anderson

Director, Strategy and Innovation

cc: James M. Bass, Executive Director
Marc D. Williams, P.E., Deputy Executive Director
Jerry Haddican, Director, Government Affairs

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