



April 2, 2020

The Honorable Elaine L. Chao Secretary of Transportation United States Department of Transportation 1200 New Jersey Ave., S.E. Washington, DC 20590	The Honorable Michael Kratsios United States Chief Technology Officer Office of Science and Technology Policy 1650 Pennsylvania Ave., N.W. Washington, DC 20504
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RE: Docket No. DOT-OST-2019-0179. FR Doc. 2020-02332. Notice of Comments: Ensuring American Leadership in Automated Vehicle Technologies posted 02/06/2020.

Dear Secretary Chao and Mr. Kratsios:

On behalf of the members of the Association for Unmanned Vehicle Systems International (AUVSI), I am writing in support of the guidance and related language in “Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0 (AV 4.0).” AUVSI is the world’s largest non-profit organization devoted to advancing the unmanned systems and robotics communities, and represents corporations and professionals from the defense, civil and commercial markets. AUVSI prioritizes safety in the adoption of these new technologies.

In order to earn the trust of the public and consumers, our industry must demonstrate how unmanned systems are safer than the current manned alternative. AUVSI’s mission is to advocate for the various technologies that enable commerce and transportation to move more efficiently and safely. Our members represent the innovators who will build these technologies that will integrate into existing framework.

AUVSI would like to begin by thanking the Office of the Secretary of Transportation (OST) and the White House Office of Science and Technology Policy (OSTP) for seeking comments on these issues. AV technology is rapidly changing, and guidance is needed to determine how it will grow and evolve in an environment that can appropriately regulate them in the future.

The United States loses 37,000 people a year to traffic crashes.¹ NHTSA estimates that 94% of crashes are due to human error². Therefore, about 35,000 people could be potentially saved annually by connected automated vehicles in the United States alone. Over the course of development in these new life-preserving technologies, everyday counts, and the sooner we can incorporate new proven safety features in our on-road vehicles, the sooner we can decrease those fatalities.

AV 4.0 also celebrates innovation by creating avenues of growth and incentives to pursue new technologies. This marriage will promote safety and ingenuity to incentivize our industry members to create better and safer products without fear of unnecessary or overly restrictive rules and regulations to navigate.

AVs bring many benefits to our nation’s transportation networks, including efficiency, both economically and environmentally. As AV technology is increasingly adopted by manufacturers and consumers, we

¹ https://www.transportation.gov/sites/dot.gov/files/2020-02/SafetyBandFebruary2020.1_0.pptx

² <https://www.digitaltrends.com/cars/2016-nhtsa-fatality-report/>



expect to see a drop-in traffic congestion on our roads. Among the many benefits envisioned for automated systems is that these vehicles can communicate with their surroundings in real-time, thereby eliminating most surprise road conditions. This will have a substantial impact on the way people commute, how energy is used and how time can be saved by having the communication necessary to fully integrate these technologies.

As with all changing technologies, it is important to earn the public's trust. AUVSI is happy to see that the approach by the OST and OSTP includes ways the public can see the technologies demonstrated and interact with them as they're introduced.

As the OST and OSTP continue to work through the adoption of these new technologies, we appreciate their willingness to work with industry partners like AUVSI as they look for feedback and comments. AUVSI and its members are pleased the OST and OSTP have chosen to consider these issues and focus on safety while creating an environment for growth and adoption of automated vehicles

Thank you,

A handwritten signature in black ink, appearing to read 'Brian P. Wynne', with a long horizontal flourish extending to the right.

Brian Wynne
President and CEO
AUVSI