



April 2, 2020

Finch Fulton  
Office of Secretary (OST)  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

**Re: Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0 (AV 4.0) (Docket No. DOT-OST-2019-0179)**

Volvo Group North America (“VGNA”) respectfully submits its comments on the U.S. Department of Transportation’s (“USDOT’s”) public notice on Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0 (AV 4.0) (Docket No. DOT-OST-2019-0179), dated February 6, 2020.

The Volvo Group is one of the world’s leading manufacturers of trucks, buses, construction equipment and marine and industrial engines. The Volvo Group develops, manufactures, and sells heavy-duty trucks, buses, construction equipment, and motor coaches and their powertrains in the U.S. under the brand names of Volvo Trucks, Mack Trucks, Volvo Construction Equipment, Nova Bus, Volvo Bus, and Prevost. The Volvo Group has been manufacturing in the U.S. since 1900 and directly employs nearly 15,000 Americans. We indirectly employ tens of thousands more Americans through our supply chain and dealer networks. Our major facilities are in North Carolina, Pennsylvania, Virginia, Maryland, and New York. We have invested nearly \$2 billion in our nine manufacturing facilities since 2002, and we typically spend more than \$250 million in R&D in the U.S. every year.

- VGNA is encouraged to see the focus on safety as well as the removal of barriers to innovation and commends the USDOT for considering the fast, evolving technological landscape for automated (and connected) vehicles.

- VGNA supports the USDOT position on continuing the advancement of an updated Manual on Uniform Traffic Control Devices (“MUTCD”) and advocates for appropriate standards (and harmonization) for minimum infrastructure components, such as lane marking, pavement marking, road signs, etc.
- While not a prerequisite to vehicle automation, connectivity has the potential to enhance the capabilities of automated vehicles to interact with the physical and digital infrastructures, thereby improving traffic safety and efficiency. The recent proposal from the Federal Communications Commission (“FCC”) to amend the usage of the 5.9 GHz band by allowing unlicensed WiFi users and Cellular Vehicle-to-Everything (“C-V2X”) devices will undermine this capability. Furthermore, it implies that FCC, and not the free market, will determine the technology standards for connected vehicles and infrastructures, going against the U.S. government’s stance on remaining technology neutral. With this in mind, VGNA supports and encourages the USDOT and FCC to work together for achieving alignment with the principles set forth in AV 4.0.
- While we appreciate current federal efforts to minimize state and local regulatory constraints on Automated Driving Systems (“ADS”), strong federal standards will eventually be needed to avoid a state-by-state patchwork that could undermine safety considerations in the deployment of AV 4.0. VGNA is supportive of setting a high threshold for safety, and federal efforts to ensure that all states meet these safety standards, and follow best practices for testing and deployment of ADS.
- VGNA supports the use of Voluntary Self Safety Assessments (“VSSA”s) with appropriate ADS information (design, safety, and operating parameters) for alleviating stakeholder and general public concerns.
- VGNA commends the USDOT for their leadership on the topic of AV technologies, and supports the systematic, science-based, and collaborative approach laid out in AV 4.0.



Volvo Group North America appreciates the opportunity to submit these comments, and looks forward to working with the White House Office of Science and Technology Policy, USDOT and other government agencies, as well as industry partners and other stakeholders, in the development of safe and reliable practices associated with connected and automated vehicles.

Please do not hesitate to contact us if additional information is needed.

A handwritten signature in blue ink, appearing to read "Aravind Kailas".

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