



April 2, 2020

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

RE: Docket No. DOT-OST-2019-0179. FR Doc. 2020-02332. Notice of Comments: Ensuring American Leadership in Automated Vehicle Technologies

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, including automated vehicles. Our members represent corporations and professionals from the defense, civil and commercial markets. AUVSI’s mission is to advocate for the adoption of new technologies that enable commerce and transportation to move more efficiently and safely.

AVs stand to bring many benefits to our nation’s transportation networks, including both economic and environmental efficiency. For example, as AV technology is increasingly adopted by manufacturers and consumers, we anticipate traffic congestion to decrease. Eventually, we envision that AVs will even communicate with their surroundings in real-time, thereby eliminating most surprise road conditions. This will have a substantial impact on the way people commute and how energy is used. It will also save time once the communication infrastructure is in place to fully integrate these technologies.

AV technology is rapidly changing, and regulations must evolve now and in the future to foster on-going safety improvements. AV 4.0 celebrates innovation by creating avenues of growth and incentives to pursue new technologies. Sensible regulation that still allows innovation to flourish will incentivize our members to create better and safer products without fear of unnecessary or overly restrictive rules and regulations to navigate.

Safety is a high priority for AUVSI, and we are therefore pleased that safety is also a core interest in AV 4.0. The United States loses 37,000 people a year to traffic crashes.¹ NHTSA estimates that 94% of crashes are due to human error.² Therefore, connected automated vehicles could potentially save about 35,000 lives annually in the United States alone. The sooner we can incorporate new proven safety features in our on-road vehicles and cultivate their acceptance among the general public, the sooner we can decrease those fatalities.

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/>

Garnering the public's trust is paramount with all emerging technologies. And in order to gain that trust, our industry has a responsibility to demonstrate how highly automated systems are safer than the current manned systems. AUVSI is pleased that AV 4.0 provides details about how the public can see and interact with AV technologies as they are introduced, allowing our industry to demonstrate these new proven safety features in our on-road vehicles.

Finally, as the Office of the Secretary of Transportation and the White House Office of Science and Technology Policy continue to work through the adoption of these new technologies, we appreciate their willingness to solicit feedback from industry partners like AUVSI. Industry-government collaboration has allowed the unmanned systems industry to flourish thus far. We must do all we can to continue to foster this exchange of ideas and concepts going forward as we continue to work towards integrating automated vehicles onto our roads.

Thank you for the opportunity to comment on these important issues. We greatly appreciate your consideration of AUVSI's views and would welcome the opportunity to address any questions you may have for us on this issue. Please note these comments are revised from a previous filing but continue to reflect AUVSI's support for the guidance provided in AV 4.0.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian P. Wynne", followed by a horizontal line extending to the right.

Brian Wynne
President and CEO
AUVSI