

Comment from Ben Epstein

I want to start this comment by saying that I am a student in a class on regulation and would argue that there needs to be clarification on autonomous vehicles and protection for delivery trucks and their definition of "automated driving systems."

In the context of driving technology, the word 'autonomous' can mean several different things. It can refer to current technology such as automated braking and lane-keeping assistance, or it can reference fully autonomous driverless vehicles. The scope of 'autonomous vehicles' is limited to only level 4 and 5 automation as defined by the Society for Automotive Engineers.

"Level five" autonomous vehicles or vehicles that do not need any human interaction during driving are far from currently being the standard. That being said, "level five" delivery trucks have the highest priority because of the reduction in labor costs it promises. This document proposes modifications to the driver's seat as a reference point, spatially, for other locations within the vehicle. For example, the proposed rule goes into detail in discussing the placement of driver's seats or "dummy placements" on buses. Due to the relative development with automation, delivery trucks should take priority, or at the very least, be further detailed in this proposed rule.