



**MOTOR VEHICLE
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Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Room W12-140
Washington DC 20590

Re: U.S. Department of Transportation National Highway Traffic Safety Administration
(NHTSA) Request for Comment on Docket DOT-NHTSA-2020-0070

Dear Docket Clerk:

The Maryland Department of Transportation (MDOT) is pleased to provide comments on the United States Department of Transportation (U.S. DOT) National Highway Traffic Safety Administration (NHTSA) Request for Comment (RFC) on the “Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative” (Docket DOT-NHTSA-2020-0070) for the voluntary collection of information from entities testing vehicles equipped with an automated driving system (ADS).

The MDOT is pleased to have been asked to be an early participant in the pilot program for the AV TEST initiative. Maryland supports NHTSA in facilitating the safe development, testing, and integration of automated driving technology in the United States. Maryland is open for business and eager to realize the life-saving and economic benefits of Connected and Automated Vehicle (CAV) technology, while ensuring safety for all. We are embracing CAV technology and innovation through continuing cooperation and collaboration with partners interested in researching, testing, and deploying CAVs in Maryland. Partnering with NHTSA, and subsequently sharing and collaborating with the other AV TEST participants is an important part of moving automated driving technology forward.

The MDOT is a multimodal agency with responsibility for, and expertise in, air, land, and water transportation facilities and services. For the last five years, the Maryland CAV Working Group has addressed CAV issues in Maryland and positioned the state to support the safe testing and deployment of CAV technologies. In support of our vision to uphold and enhance a safe, efficient, and equitable transportation future by delivering collaborative and leading-edge CAV solutions, Maryland is working with several companies to test highly automated vehicle technology on public roads and spaces. Our experience with these companies continues to benefit everyone involved, including emergency responders, local and state government agencies, private companies, and Marylanders in general. Participating as the first of nine pilot states in NHTSA’s AV TEST initiative helps to advance Maryland’s efforts and highlight the collaborative forces already underway.

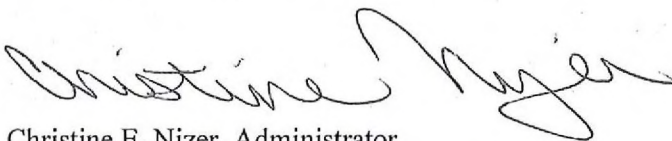
The MDOT believes that the AV TEST is vital for NHTSA to collect data to inform their work in the area of establishing rules and regulations that may be needed to support the safe integration of automated vehicles into the national transportation system. We commend NHTSA for the AV TEST data collection effort and encourage continued uniform data collection to track growth and usage of vehicles equipped with ADS across states and regions. We suggest that NHTSA consider establishing a time to sunset the AV TEST tracker to eliminate data collection redundancy once ADS equipped vehicles are compliant with the Federal Motor Vehicle Safety Standard (FMVSS) and issued Vehicle Identification Numbers (VIN) at which point they would be subject to reporting within existing NHTSA reporting systems such as the Final Analysis Reporting System (FARS) and Crash Report Sampling System (CRSS).

The MDOT's preliminary experience with AV Test suggests that States will spend more than 10 hours per year on supporting their AV TEST profiles. Time should be allotted for states to register and train their designated staff to use the database. States that solely focus on entering adopted legislation and regulation information once or twice a year may find the NHTSA's 10 hours per year estimate sufficient. However, for the foreseeable future, States may be continually updating their AV testing policies and procedures, and immediate posting of these updates would be beneficial to NHTSA and the AV TEST community. It is important to note that the MDOT will be responsible for updating the database for all of its multi-modal transportation business units, as opposed to one single agency/entity. Given the rate of change and growth in the industry, it is estimated that 10 hours per month may need to be dedicated to this exercise.

Although this is a voluntary system, the MDOT suggests that in order to improve the quality of the collected data, NHTSA encourages and implements measures and a standard for timeliness, accuracy, completeness, and uniformity. Open text fields may lead to errors including the use of different terminology to describe the same or similar conditions, thus edit checks within the system are recommended to help preserve data uniformity and the ability to conduct automated data searches

Thank you again for the opportunity to participate in the AV TEST initiative. The MDOT looks forward to continued collaboration with NHTSA and other contributors. If you have any questions, please do not hesitate to contact us at cnizer@mdot.maryland.gov or jports@mdta.state.md.us.

Respectfully submitted,



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