



**GENERAL MOTORS LLC**  
Global Vehicle Safety

August 31, 2020  
USG 4966

Mr. James C. Owens  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

**RE: Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative; Notice and Request for Comment, NHTSA Docket 2020-0070, 85 FR 39975 (July 2, 2020)**

Dear Deputy Administrator Owens:

General Motors LLC and Cruise LLC (“GM”) appreciate the opportunity to provide comments addressing NHTSA’s Notice and Request for Comment on the topic of Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative.

GM was among the first automakers to submit a Voluntary Safety Self-Assessment to the National Highway Traffic Safety Administration (“NHTSA”) in 2018. Recognizing that public acceptance is critical to fully realizing the safety benefits of autonomous vehicles, we continue to work diligently towards public transparency and education. As part of this mission, we support the ongoing work from the Department of Transportation and NHTSA to advance public understanding and familiarity with on-road testing activities of automated vehicles through the AV TEST Initiative.

We are pleased to participate in the AV TEST Initiative and support the Agency’s goals to enhance public education and engagement with automated vehicle testing by coalescing information regarding various testing operations or requirements in a centralized resource.

As the AV TEST Initiative continues to develop, we encourage the Agency to continue a flexible approach for companies to share publicly available information and to recognize that the types and amount of data available could vary significantly depending on the company. Further, we encourage the Agency to maintain voluntary participation in the AV Test Initiative.

Sincerely,

John P. Capp  
Director  
Global Safety Technology & Strategy