

August 31, 2020

Docket Management Facility
US Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Level
Room W12-140
Washington, DC 20590-0001

Attention: Docket No. DOT-NHTSA-2020-0070

Dear Sir or Madam:

Einride has reviewed the National Highway Traffic Safety Administration (NHTSA) and Department of Transportation (DOT) notice and request for comments (RFC) regarding approval for the information collection request titled “Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative” and is pleased to provide comments.


Einride develops a new type of freight vehicle, the Einride Pod, specifically designed for level 4 autonomy. The vehicle has no driver’s cabin but is monitored and can be remote-controlled by an operator in a control center. Einride was “first-to-market” with such a vehicle when it in 2019 received a permit from the Swedish Transport Agency to commence commercial operations on a public road, at a DB Schenker site in Sweden. Einride is currently working with several other partners to test the Einride Pod for freight transportation on public roads.

Einride fully supports the AV TEST initiative and believes that it will help in increasing the public’s understanding, trust and acceptance of autonomous vehicles on public roads. Einride appreciates that the information will be collected on a voluntary basis. However, to simplify the process of providing data as well as improving the understanding and guaranteeing the quality of the data, Einride suggests that NHTSA implements a standard for terminology and enforces accuracy requirements on the collected data. This would furthermore ensure uniformity of the collected data.

Einride looks forward to participating in the AV TEST initiative and further collaboration with NHTSA and all other contributors to the initiative.

Sincerely,

DocuSigned by:

A handwritten signature in black ink that reads 'Christian Larsson'.

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Christian Larsson

Director Autonomous Drive
Einride AB