



August 31, 2020
James C. Owens, Deputy Administrator
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Notice and request for comments on a request for approval of a new information collection; Automated Vehicle Transparency and Engagement for Safe Testing (“AV TEST”) Initiative, Docket No. DOT-NHTSA-2020-0070, 85 FR 39975

The Self-Driving Coalition for Safer Streets (“Coalition”) is pleased to submit these comments regarding the National Highway Traffic Safety Administration’s (“NHTSA”) notice and request for comments on a request for approval of a new information collection titled “Automated Vehicle Transparency and Engagement for Safe Testing” (“AV TEST”) published in the Federal Register on July 2, 2020.¹

The Self-Driving Coalition represents a unique cross-section of automotive, technology, ridesharing, and robotics companies brought together in their commitment to bring the tremendous potential safety and mobility benefits of self-driving cars to consumers in the safest and swiftest manner possible. The Coalition is comprised of Argo AI, Aurora, Cruise, Ford, Lyft, Nuro, Uber, Volvo Cars, and Waymo.

As NHTSA has recognized, autonomous vehicles (“AVs”) offer substantial safety and mobility benefits, holding the potential both to save lives and to change the way we drive.² An estimated 94 percent of all crashes are due to human error, including reckless, drunk, and distracted driving.³ In addition, the United States is home to millions of individuals—including seniors and people with disabilities—who would benefit greatly from the increased safety and mobility that AVs would provide. A federal framework that helps advance the safe and timely deployment of AVs at scale will bring these benefits to the public sooner.

By encouraging companies and localities to voluntarily submit information about AV testing—data that will be made available through an online, public-facing platform—the AV TEST Initiative helps build public awareness of and confidence in the safety of AVs and the potential benefits that their deployment will bring. Further, providing companies and localities with a platform to submit testing information will

¹ U.S. Dep’t of Transp., Nat’l Highway Traffic Safety Admin., Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative , Agency Information Collection Activities; Notice and Request for Comment, Docket No. DOT-NHTSA-2020-0070, 85 FR 39975 (July 2, 2020), <https://www.govinfo.gov/content/pkg/FR-2020-07-02/pdf/2020-14227.pdf>

² See NHTSA, Automated Driving Systems, <https://www.nhtsa.gov/vehicle-manufacturers/automated-driving-systems>.

³ Press Release, U.S. DOT Releases 2016 Fatal Traffic Crash Data (Oct. 6, 2017), <https://www.nhtsa.gov/press-releases/usdot-releases-2016-fatal-traffic-crash-data> (noting that human choices are linked to 94% of serious crashes).



increase transparency to key stakeholders across the AV ecosystem, such as state and local governments, industry participants, consumer advocates, and the general public. The Coalition is proud that several of its members volunteered to be among AV TEST's initial participants, and we support actions by NHTSA to create a platform for the Federal government and State and local governments to coordinate and share information regarding AV testing through the AV TEST Initiative web pilot. We believe the AV TEST Initiative will improve transparency, familiarity with, and public support for the development and testing of automated driving systems.

The Coalition appreciates this opportunity to continue its engagement with NHTSA and other stakeholders on important issues affecting the AV industry and consumers. We look forward to providing further comments and specific proposals to assist NHTSA in developing and advancing this important initiative.

Sincerely,

/s/

Ariel S. Wolf
Counsel, Self-Driving Coalition for Safer Streets