Comment from Anonymous

Setting a framework for the functionalities of ADS is a move forward from more hardware-based standards. This is important since many ADS functions are becoming more heavily reliant on software which requires a more unique method of regulation. It is important to continue an adaptive regulation policy that can continue to iterate the technology develops. I appreciate the focus on an outcome-based regulation that seeks to measure the performance of ADS. This is a great principle for regulating emerging technologies. I am also happy to see more rulings like this being opened to comment from the public so that more individuals and companies that are directly a part of this industry can express their thoughts.

To address the subject of this ruling I feel that it is becoming more necessary to have a common safety standard that ensures the safety of consumers and allows companies to focus on continued innovation. A more united safety standard and assessment standard encourages further competition in the market while protecting the safety of the consumers. This is similar to how the airspace industry is regulated. Current safety standards include proprietary internally developed tests that are not publicly known or measure other factors like miles driven that may not accurately demonstrate the safety of the system. Some other companies like Mobileye have proposed an open safety model called Responsibility Sensitive Safety. These types of safety standards focus on the measurable performance of an ADS while encouraging consumer confidence in an open standard.

Some assessment mechanisms could be software simulated algorithm tests and situation simulation to verify the integrity and reliability of software algorithms. One factor of performance that I believe should be certified is the ability for software to know when it is not able to handle a situation and notify the driver of such a situation effectively. Along with the performance and safety of ADSs ethical questions are also raised that should be considered however these are difficult to regulate properly. I do think that a public discussion of the technology needs to happen more. None the less current testing of ADSs suggests that they provide more safety than a human operator which falls in line with the goals of the National Highway Traffic Safety Administration. Thus, it is important to encourage the development of the technology and remove unintended and unnecessary regulatory barriers.