



OHIO DEPARTMENT OF TRANSPORTATION

Mike DeWine, *Governor*

Jack Marchbanks, Ph.D., *Director*

1980 W. Broad Street, Columbus, OH 43223

614-466-7170

transportation.ohio.gov

March 31, 2021

Mr. Steve Cliff
Deputy Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Notice and Request for Comment; Framework for Automated Driving System Safety [Docket No. NHTSA-2020-0106]

Dear Deputy Administrator Cliff:

The Ohio Department of Transportation (ODOT) appreciates the opportunity to provide input as the National Highway Traffic Safety Administration (NHTSA) seeks public comment on the Framework for Automated Driving System (ADS) Safety rulemaking process.

The agency notes in the request for comment (RFC) that "it is appropriate to begin to consider how NHTSA may properly use its regulatory authority to encourage a focus on safety as ADS technology continues to develop." As an infrastructure owner/operator the Ohio Department of Transportation (ODOT) shares NHTSA's desire to ensure that ADS technology is developed and deployed in a safe and efficient manner on our nation's roadways. As Governor Mike DeWine has said repeatedly, "the public's safety on our roads is of paramount importance." This effort is a key step in building trust between the public, federal and state regulators, and vehicle manufactures as ADS capabilities mature and these vehicles are introduced into our transportation system.

With the increased capabilities of ADS we, as DOTs, need to pivot to meet these challenges head on. Transportation is in the midst of a transformation, the likes of which have not been seen since the invention of the automobile. Disruptive forces, driven by advances in vehicle automation, connectivity, electrification and sharing (ACES), are at the heart of the transformation. Environmental, public health, social equity, economic, transportation safety, and both rural and urban mobility concerns are hastening the need for innovation in the policies governing transportation solutions and infrastructure.

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With ADS at the pre-market stage, DriveOhio has focused on a strategy of project-based data collection, that we feel gives Ohio the flexibility to learn and pivot in real time. We believe NHTSA has a role to play and could provide policy guiderails for greater consistency among ADS developers and give federal, state, and local authorities additional valuable information on how ADS are being developed, tested and deployed.

In closing, I want to take a moment and acknowledge NHTSA's commitment to awareness and transparency in educating the public on the safety and performance of ADS through the NHTSA AV TEST Initiative. Partnering with states, local governments, and private-sector stakeholders in the ADS community is a true value as we work to develop the policies and standards that will allow these vehicles to deploy and scale on our roadways. Through AV TEST and this request for comment, we will enhance public acceptance and knowledge of these systems as we work together to develop the transportation system of the 21st century.

If we can provide any additional information or if you have any questions please do not hesitate to contact ODOT at Jack.Marchbanks@dot.ohio.gov or 614-466-2336.

Sincerely,



Jack Marchbanks, Ph.D.
Director