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NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION (NHTSA)
U.S. DEPARTMENT OF TRANSPORTATION*

Notice of Request for Comments: NHTSA-2021-0013

Agency Information Collection Activities; Notice and Request for Comment;
Automated Driving Systems 2.0: A Vision for Safety

SUBMITTED BY: Çetin Meriçli, Founder and CEO of Locomotion

Locomotion is the world's first trucking technology platform to offer human-guided autonomous conveying on the road to full autonomy. Launched in 2018 by veterans of Carnegie Mellon's National Robotics Engineering Center, the Locomotion team includes some of the world's foremost experts in robotics technology, safety, and artificial intelligence. Through our core technology, the Autonomous Relay Convoy™ (ARC), one driver pilots a lead truck with technology augmentation while a follower truck operates in tandem through a fully autonomous system. Through this process, Locomotion can gain on-road, real world experience to train and develop its fully autonomous system and autonomous freight network while prioritizing safety and the human operators.

Locomotion is dedicated to safety, transparency, and establishing a realistic dialogue with the public about the capabilities and limitations of autonomous systems. We believe an understanding of the human-centric nature of our business model will improve public acceptance around the technology. We are committed to helping people understand how this technology can work for them, not instead of them.

Locomotion applauds NHTSA work to provide voluntary data sharing platforms to improve the public's understanding. We intend to submit a Voluntary Self-Safety Assessment (VSSA). We are active participants in the development of UL 4600 and UL 4600-2. As outlined in the NHTSA Advanced Notice of Proposed Rulemaking: Framework for Automated Driving System Safety, these developing approaches combine best-in-class industry consensus-based standards together to prove the safety of a system. Locomotion plans to comply with UL 4600 and use this effort to shape our VSSA submission. We also intend to post future tests and demonstrations to the AV TEST website.

As such, we believe the information collection approval should be extended for these activities.

We look forward to providing you and your team updates on our ongoing work.

Thank you,

A handwritten signature in black ink, reading "Çetin Meriçli". The script is fluid and cursive, with the first letter of each name being capitalized and prominent.

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