

June 24, 2021

Dr. Steve Cliff  
Acting Administrator  
National Highway Traffic Safety Administration  
Department of Transportation  
1200 New Jersey Avenue S.E., West Building  
Washington D.C. 20590-0001

Dear Acting Administrator Cliff,

The Alliance for Automotive Innovation (“Auto Innovators”) and its members are committed to a cleaner, safer, and smarter transportation future. Automated vehicles (“AVs”) are a critical component of our ability to realize this vision. For this reason, we strongly urge you to reconsider the withdrawal of the *Pilot Program for Collaborative Research on Motor Vehicles with High or Full Driving Automation* from the rulemaking process.<sup>1</sup>

As you are aware, Auto Innovators released an AV Policy Roadmap (“Roadmap”) in December of last year. The Roadmap includes 14 specific recommendations for the National Highway Traffic Safety Administration (“NHTSA”) and other federal policymakers to advance the testing and deployment of AVs in the United States. One of the key recommendations contained in the Roadmap was the establishment of a robust pilot program for AV testing and deployment.

A national AV pilot program is an important component of a much needed and long overdue federal regulatory framework for AVs. AV developers have invested billions of dollars in developing this technology and need a reliable and viable pathway to deployment in the United States. A pilot program could enable the safe and responsible testing and deployment of AVs at a wider scale under the direct oversight of NHTSA. Importantly, it could provide an avenue for NHTSA to advance its AV-related research objectives and to gather the data that it needs to establish a longer-term, permanent AV regulatory framework. At the same time, a focused pilot program with NHTSA’s oversight could foster additional public exposure to the technology and help us collectively overcome some of the existing consumer acceptance challenges associated with automated safety technologies.

The establishment of a national pilot program for AVs presents a significant leadership opportunity for NHTSA. The agency can craft a program – from the ground up – that is targeted to address current

---

<sup>1</sup> RIN: 2127-AL99, 2021 Spring Regulatory Agenda.

opportunities and challenges for AVs and help to bring this technology safely to the U.S. market. For instance, this sort of program does not need to be one-size-fits-all. Based on the applicant's unique technology and use case, NHTSA could allow a specified number of vehicles to be deployed under certain conditions and for a defined duration specific to that applicant. This would give NHTSA flexibility to provide distinct and targeted oversight over various types of AV deployments. For additional recommendations on the potential structure of a national pilot program for AVs, we invite you to review Appendix 5 of our comments to NHTSA in response to the ADS Safety Framework ANPRM.

Focused and sustained leadership from NHTSA is required to ensure that AV technology and the important benefits it can deliver are realized. Because AVs cannot get distracted, drive impaired, or fall asleep at the wheel, AVs have the potential to significantly improve the safety of our nation's roadways. In addition, by using all-electric powertrains or leveraging energy-saving techniques such as optimizing routing and eco-approach and departure, AVs can provide energy and environmental benefits. AVs also hold promise to increase equity in transportation and provide access to mobility to underserved communities.

The AV pilot program concept should not be prematurely abandoned by NHTSA. We urge you to reconsider its withdrawal and to meet with us and other stakeholders to develop and implement a thoughtful AV pilot program that meets the needs of NHTSA, the industry, and consumers. We look forward to continuing to work with you to create a cleaner, safer, and smarter transportation future and to ensuring that the U.S. remains a global leader in innovative automotive technologies.

Sincerely,

A handwritten signature in black ink, appearing to read "John Bozzella". The signature is fluid and cursive, with the first name "John" written in a larger, more prominent script than the last name "Bozzella".

John Bozzella  
President & CEO  
Alliance for Automotive Innovation