

Comment from Kevin McCutcheon

Posted by the **National Highway Traffic Safety Administration** on Aug 8, 2022

These requests for exemption seem entirely reasonable. They're asking for relief from regulations that don't have any meaningful purpose in the context of the type of vehicle they're building. There won't be any human driver and therefore, some of the features necessary to help a driver operate the vehicle more effectively won't help the automated system to operate the vehicle at all.

I also think it's important to view this request in the context of the technology being implemented. By any reasonable statistical threat model, GM and several other manufacturers have achieved a level of safety far surpassing that of human drivers. Once most vehicles are driven autonomously, it's clear, based on the statistical evidence we already have, that tens of thousands of lives and hundreds of thousands of injuries will be prevented annually. In addition, our infrastructure will be more effectively utilized with much higher throughput and people will reclaim all of the time currently wasted driving. They will provide increased mobility access to low income communities through less expensive ride-hailing services. The enormous public good that this technology can provide should be considered in regulatory decisions that can help to speed implementation decisions. Not only should this petition be approved, but NHTSA should make all possible efforts to streamline the process of reaching widespread commercial use.