

August 15, 2022

Dr. Steven Cliff
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
West Building
Washington, DC 20590

RE: NHTSA Docket #: NHTSA-2022-0067-0002

Dear Administrator Cliff:

I write today in support of the General Motors (GM) and Cruise petition, which will help accelerate the deployment of self-driving cars and the benefit this technology will bring to society.

Automation Alley is the World Economic Forum's Advanced Manufacturing Hub (AMHUB) for North America and a nonprofit Industry 4.0 knowledge center with a global outlook and a regional focus. We facilitate public-private partnerships by connecting industry, education and government to fuel Michigan's economy and accelerate innovation. Our programs give businesses a competitive advantage by helping them along every step of their digital transformation journey. We obsess over disruptive technologies like AI, the Internet of Things and automation, and work hard to make these complex concepts easier for companies to understand and implement.

The United States risks losing its technological leadership in the autonomous vehicle industry unless it enacts policies to protect its leadership in the development, manufacture, and deployment of autonomous vehicles against global competitors, specifically China and Europe, that are rapidly developing AV technology. The U.S. could easily fall behind and would lose the opportunity to write the rules of the AV road if we do not support and foster the growth of American-developed and manufactured AVs like the Cruise Origin.

The Cruise Origin is a multi-billion-dollar investment from GM and Cruise that will define the future of the auto sector. As Detroit was the birthplace of the automotive industry, it will continue to serve as the epicenter for the automotive industry's rapid transformation into the future of transportation.

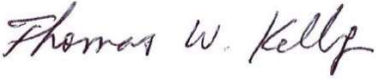
Manufacturing the Origin will support economic growth and further catalyze the transition to fully electric vehicles. The Origin will be produced at GM's newly renovated and opened Factory ZERO located in Detroit-Hamtramck, Michigan, which is the first assembly plant fully dedicated to EV and AV manufacturing. GM will be investing \$2.2 billion to retrofit this plant for the production of autonomous and electric vehicles.

Additionally, this facility will contribute to over 2,000 union manufacturing jobs— with the Origin serving as one of the first major production lines at the site. Granting this petition will continue to support investments in research and development, manufacturing, tech innovation, and jobs in America and right here in Detroit. These jobs will bolster our local economy and attract talent to Detroit.

Across the U.S. economy, the automotive industry supports 10.3 million jobs, representing 5.5% of total GDP. Self-driving technology will define the future of the automotive industry. The Origin represents an opportunity to spur this industry further, connecting Silicon Valley technology development with industrial heartland expertise as a roadmap for the future of U.S. manufacturing.

We appreciate the benefits that AVs will provide for American manufacturing and technological leadership, as well as our local and regional economies, and it is therefore in the public interest for NHTSA to grant this petition for exemption. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Thomas W. Kelly". The signature is written in a cursive style with a prominent initial 'T'.

Executive Director and CEO