



# TRANSPORTATION IMPROVEMENT ASSOCIATION

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August 21, 2022

Dr. Steven Cliff  
Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

Re: Docket No. NHTSA-2022-0067

Dear Administrator Cliff:

I am writing on behalf of the Transportation Improvement Association (TIA) to express support of General Motors' petition for a temporary exemption from certain requirements in six Federal Motor Vehicle Safety Standards (FMVSS) for its Automated Driving Systems (ADS) equipped vehicle, the "Cruise Origin."

TIA was created in 1967 by more than two-hundred government and corporate leaders. Our mission is to identify transportation safety trends that negatively impact society, and develop solutions that can be implemented to save lives, prevent injuries, and improve mobility. I believe the approval of this petition will support TIA's mission by accelerating the deployment of self-driving vehicles, and ultimately move our nation toward zero crashes.

Self-driving vehicles have a broad range of societal benefits, the most important being safety. The National Highway Traffic Safety Administration (NHTSA) projects that an estimated 42,915 people died in motor vehicle traffic crashes last year, a 10.5% increase from the 38,824 fatalities in 2020. The projection is the highest number of fatalities since 2005, and the largest annual percentage increase in the Fatality Analysis Reporting System's history. Behind each of these numbers is a life tragically lost. These crashes were caused largely by human error and behavior. By reducing human error, self-driving vehicles have the potential to save lives.

Furthermore, approving this petition does not exempt the company from certifying or being responsible for its vehicles' safety performance. The current FMVSS were written at a time in which self-driving vehicles were not a consideration and, thus, are predicated on a human driver having control of the vehicle. In its petition, General Motors and Cruise demonstrate that its self-driving vehicles satisfy the safety purpose and intent of the FMVSS, but - in instances that directly or indirectly reference a human driver - meet that intent in an acceptable, alternative fashion.

TIA appreciates the societal benefits that autonomous vehicles will bring. Therefore, I believe it is in the public interest for NHTSA to grant this petition for exemption.

Respectfully,

JIM SANTILLI  
Chief Executive Officer