

August 19, 2022

Acting Administrator Ann Carlson
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: General Motors Part 555 Petition for Temporary Exemption for the Cruise Origin, Request for Public Comment

Dear Acting Administrator Carlson,

As the nation's leading advocate for the technological modernization of our transportation system by focusing on advancing research and deployment of intelligent transportation technology, the Intelligent Transportation Society of America (ITS America) is grateful for the opportunity to comment on General Motors' (GM) petition for a temporary exemption from certain Federal motor vehicle safety standards (FMVSS) requirements for its ADS-equipped vehicle, the "Cruise Origin" (Origin).

ITS America was founded in 1991 as an advisory council to USDOT on technology innovation and emerging transportation technologies. ITS America is the only organization in the country that represents all sectors – public, private, academic, and nonprofit – to advance transportation technology. Our membership includes state and city departments of transportation, transit agencies, metropolitan planning organizations, automotive manufacturers, technology companies, engineering firms, automotive suppliers, insurance companies, and research and academic universities. Our vision is a better future transformed by intelligent mobility: one that is safer, greener, and smarter. Our vision aligns directly with the USDOT's goals to advance safety, climate, and equity. ITS America believes that the approval of GM's petition in this matter will significantly bolster efforts to achieve those priorities.

ITS America has long argued that automated vehicles (AVs) have enormous potential to improve roadway safety and performance and contribute to more livable, vibrant, and equitable communities by providing more affordable mobility options; improving transit access by extending its reach; improving freight movement; and freeing up parking for other needs, including transit corridors, bike lanes, and walkable places, including sidewalks and plazas. AVs can provide mobility options for people with disabilities and seniors, as well as access for underserved communities. ITS America supports policies and regulatory frameworks that facilitate the safe testing, deployment, and integration of automated vehicles into the surface transportation system and address automated vehicles, self-driving trucks, automated transit, workforce impacts and mitigation strategies, and land use and transportation system integration.

Specifically, ITS America supports a safe and reasonable increase in the number and duration of Federal Motor Vehicle Safety Standard exemptions. Developers, working with NHTSA, cities, counties, and states, need experience operating automated vehicles in sufficient numbers to generate the broad data across a multitude of scenarios and environmental operating conditions necessary to ensure safety. ITS America believes that the Origin is a prime candidate for such an exemption, particularly given the all-electric and shared-use nature of the model. ITS America supports AV policies that will prioritize higher occupancy trips and modes made by AVs that will reduce vehicle miles traveled, including ride-hailing AV fleets and policies that increase vehicle utilization rates, decrease the need for vehicle parking to reclaim and repurpose real-estate for other purposes, and doesn't require roadway expansion. We believe that the Origin fits these criteria. Additionally, as the Origin is an American-made vehicle that is poised to support more than 2,200 union jobs, we believe that this exemption will bolster the competitiveness of our domestic vehicle automation market, a key priority in our broader economic competitiveness priorities. For those reasons, ITS America strongly supports GM's petition,

and looks forward to working with USDOT, NHTSA, and GM to further develop and deploy these innovative solutions.

Sincerely,



Laura Chace
President and CEO
ITS America