

August 22, 2022

Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue SE
West Building
Washington, D.C. 20590

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

Dear Acting Administrator Carlson:

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

MMA has served manufacturers and related industries for nearly 120 years. Our membership represents approximately 1,700 small, medium, and large manufacturers located in every corner of the state. Manufacturing represents Michigan's largest economic sector. It drives Michigan's economy and provides livelihoods for more than 635,000 Michigan citizens and their families. Manufacturing generates nearly 20 percent of the state GDP. Through our work, MMA and its members share a common goal to be good neighbors to the communities we support and where we work.

Self-driving cars have a broad range of societal benefits, the most important being safety. Simply put, self-driving cars will reduce car crashes and save lives. In the first half of 2021, an estimated 20,160 people died in motor vehicle crashes nationwide, up 18.4% over 2020. By eliminating these human errors, self-driving vehicles will save lives. Allowing the current status quo – more than 100 lives lost each day – when there is a realistic and safe solution available is unacceptable. NHTSA's stated mission is to save lives and to prevent injuries, and by encouraging new innovations like self-driving vehicles, it can achieve those objectives. We therefore encourage the Agency to favorably grant General Motors and Cruise petition for exemption.

Beyond the importance of safety, 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. Providing automakers like General Motors with the tools they need to safely test and deploy automated vehicles across the nation will create high quality jobs and generate billions of dollars in investment in the United States.

As you know, the U.S. auto industry represents 10 million jobs and 3.5% of American GDP. GM is making a \$2.2 billion investment at Factory Zero, the former Detroit-Hamtramck assembly plant that has been upgraded to become GM's first fully dedicated EV/AV assembly plant that will produce a variety of all-electric trucks and SUVs, including the Cruise Origin. Origin manufacturing will support more than 2,200 union jobs at Factory Zero and contribute to new supplier investments as nearly all Origin components are unique to the vehicle and cannot be sourced from other lines.

As manufacturers continue to invest in manufacturing, in research and development, and creating new jobs here in the US to advance AVs, NHTSA plays an import role to keep America competitive by granting this petition for exemption. We appreciate the societal and economic benefits that AVs will bring, in addition to the development and manufacture of AVs and self-driving technologies bolstering U.S. leadership in the technology and manufacturing industries. It is therefore in the public interest for NHTSA to grant this petition for exemption.

Thank you for your attention to this matter.

A handwritten signature in black ink that reads "Mike Johnston". The signature is written in a cursive, flowing style.

Mike Johnston

Executive Vice President, Government Affairs & Workforce Development