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ANNIVERSARY

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August 22, 2022

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

Re: NHTSA-2022-0067-0002

Dear Ms. Carlson:

I write on behalf of TechNet in support of the General Motors and Cruise exemption petition for the Origin. The deployment of self-driving technology, like the Origin, will modernize the way we travel, make transportation more accessible, significantly reduce our carbon footprint, and lower the number of injuries and fatalities on our roadways.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state levels. Our diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents over five million employees and countless customers in the fields of information technology, e-commerce, the sharing and gig economies, advanced energy, cybersecurity, venture capital, and finance.

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 percent over 2020, and were caused largely by human error and behavior. Self-driving vehicles can reduce human error and save lives.

The intersection of road safety, equity, and climate are a core theme of the U.S. DOT's recent National Roadway Safety Strategy. While the Origin will not be the only solution when deployed at scale, it is an opportunity to fundamentally reshape this new transportation landscape by providing an affordable, accessible, and sustainable alternative. NHTSA's stated mission is to save lives and to prevent injuries. By encouraging new innovations like self-driving vehicles, those objectives can be achieved. TechNet encourages the Agency to favorably grant GM's petition for exemption.

Manufacturing the Origin will also support economic growth and further catalyze the country's transition to fully electric vehicles. The Origin will be produced at GM's newly renovated Factory ZERO located in Detroit-Hamtramck, Michigan, which is the first assembly plant fully dedicated to electric vehicle and autonomous vehicle manufacturing. GM is investing \$2.2 billion to retrofit this plant for the production of these vehicles. Additionally, this facility will contribute to over 2,000 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 the American workforce.

The U.S. risks losing its technological leadership in the AV industry unless it enacts policies that protect and strengthen the development, manufacturing, and deployment of AVs against global competitors, specifically China, who are looking to undermine American values, influence, and security. Providing companies like GM and Cruise with the tools they need to safely test and deploy automated vehicles across the nation will not only help ensure these technologies are developed and launched here in the U.S. so we can set the rules of use, it will also create good jobs and generate billions of dollars in future investment across the country.

Further, approving this exemption petition does not exempt the company from certifying or being responsible for its vehicles' safety performance. The current Federal Motor Vehicle Safety Standards (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, GM demonstrates 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.

With these factors in mind, we urge NHTSA to grant GM's petition for exemption for the Origin. We appreciate your attention to our views on this matter. Please let me know if you have any questions or if I can be of further assistance.

Sincerely,



Carl Holshouser
Senior Vice President