

September 9, 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 and Cruise petition which will help accelerate the deployment of self-driving cars, and the benefits this technology will bring to society.

You may recall the [Health Effects Institute](#) from your time at CARB, a not-for-profit research institute that funds and independently and rigorously reviews research on the health effects of air pollution from motor vehicles and other sources in the environment. Most recently we did the most comprehensive review to date of the world's scientific literature on the [health effects of exposure to traffic](#).

In our ongoing reviews of the newest mobility options, we have been particularly impressed that self-driving vehicles have the potential to significantly reduce transportation's environmental impact through emissions reduction, energy savings, and greenhouse gas reductions by enabling more efficient driving patterns. Importantly in this specific case General Motors and Cruise's approach is to deploy zero emission autonomous vehicles, like the Cruise Origin, which will further enhance the environmental benefits of self-driving technology, particularly as the nation's electricity grid is increasingly supplied with renewable electricity. The expanded public use of zero emission vehicles will increase consumer awareness and acceptance of this important technology, as well.

Above and beyond the environmental and public health benefits, self-driving cars have the potential for important safety benefits. HEI in 2014 contributed to a major World Bank report, [Transport for Health](#), which demonstrated the joint and substantial health impacts of transportation on both road safety and air pollution. Well-designed and widely used self-driving cars, communicating effectively to all of the other vehicles on the road and sensing dangers, have substantial potential to reduce car crashes and save lives. By eliminating and/or substantially reducing human errors, self-driving vehicles can avoid the debilitating public health impacts of road injuries. We therefore encourage the Agency to favorably grant GM's petition for exemption thereby encouraging new innovations like self-driving vehicles.

Thank you for your attention to this matter and for consideration of this important petition.

Sincerely,



Daniel S. Greenbaum, President
Health Effects Institute