

Comment from Randall Duchesneau

Posted by the **National Highway Traffic Safety Administration** on Sep 12, 2022

I support GM's petition for exemption of its Origin vehicle.

I agree that compliance with the 6 FMVSS is unnecessary in a Level 4 automated driving system because there is no driver that would need to manually operate driving controls such as transmission shifts, windshield wipers, lights and turn signals, rearview mirrors, sun visors, or seatbelts positioned for a forward facing driver. Compliance with the 6 FMVSS would prevent GM from producing/selling the Origin which has a carriage style interior seating with front and rear seats facing each other and a large open space in the center that can accommodate wheelchairs.

I agree that an exemption of the Origin would make the development of a low emission vehicle easier without unreasonably lowering the safety of that vehicle. The Origin is possibly the first and only wheelchair accessible electric multipurpose vehicle. Almost all wheelchair accessible vehicles are ICE, and only a handful are hybrid. Currently people with disabilities who use wheelchairs do not have access to emissions free vehicles. Due to the nature of electric vehicles having batteries in the floor, it has been nearly impossible to retrofit an electric vehicle for wheelchair accessibility. The GM Origin is designed to be wheelchair accessible from the OEM and has created a path for equitable access to emissions free wheelchair accessible vehicles. This is possible due to the center space afforded by the carriage style seating, which relies on exceptions from the 6 FMVSS that assume a forward facing driver is needed to safely operate a vehicle.

Production of the Origin is in the Public Interest because it would increase accessible transportation options for people with disabilities. It would also promote the safety the transportation system with automated driving systems, and avoid driver specific risks including intoxicated driving, distracted driving, fatigued driving, and road rage. It would also help advance environmental justice through access to emissions free vehicles, specifically for people with disabilities who do not currently have the option of emissions free passenger vehicle transportation. It would also support US jobs by providing door to door transportation for people with disabilities so that they can go to work. Reliance on paratransit services can put a person with disabilities employment at risk, there was even a national news article about an individual with a disability who had unreliable paratransit services and was fired from their job.

The production of a wheelchair accessible AV can also help with the development of accessibility standards for autonomous vehicles and allow for the real word collection of data on usage by people disabilities, and also help address the challenging issue of independent wheelchair securement in an automated vehicle.

Having more autonomous vehicles on the road can also increase public acceptance and adoption of automated vehicles. Only a handful of wheelchair users have ever directly experienced an autonomous vehicle.

OEM development of wheelchair accessible vehicles also has the potential to reduce the cost of

personal wheelchair accessible vehicle ownership which is a significant economic barrier faced by people with disabilities. The cost of a wheelchair accessible minivan is over \$75,000. Furthermore, a number of people with disabilities are unable to drive or are prohibited from driving due to their disability, including people who are blind, low vision, or have mobility impairments. An emissions free vehicle that is wheelchair accessible and equipped with an automated driving system could revolutionize transportation for people disabilities and increase access to work, healthcare, and community.