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Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Docket No. NHTSA-2022-0067: Request for Comment on General Motors Petition for Temporary Exemption From Various Requirements of the Federal Motor Vehicle Safety Standards for an Automated Driving System-Equipped Vehicle

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing 14,000 manufacturers in every industrial sector and in all 50 states, is submitting these comments regarding the National Highway Traffic Safety Administration (NHTSA) Request for Comment to Docket No. 2022 – 0067, General Motors (GM) petition for temporary exemption from certain requirements in six federal motor vehicle safety standards for its ADS-equipped vehicle, the “Cruise Origin.”

The expanded deployment of autonomous vehicles (AVs) into our national transportation system is a historic opportunity to enhance safety on our roadways, expand access to services for underserved communities and increase efficient goods movement across our strained supply chains. U.S. innovation in AV and mobility technologies is essential to maintaining U.S. competitiveness, supporting over 10 million Americans working in the vehicle and mobility ecosystem, and strengthening the foundation for a 21st century economy.

NHTSA is authorized to issue temporary exemptions from existing Federal Motor Vehicle Safety Standards (FMVSS) to a vehicle manufacturer based on specific findings related to the public interest and a determination that overall vehicle safety level is provided. GM is seeking a petition for the “Cruise Origin” on the basis that an exemption would make the development of this low-emission vehicle easier without foregoing safety standards. This exemption process affords NHTSA a key role in increasing the deployment of AVs, and specifically low-emission AVs, across the nation’s roadways.

As the AV industry transitions from research and development to deployment, NHTSA should work to ensure safety remains the highest consideration when deliberating exemption requests but also seek to find avenues for collaboration and partnership with industry leaders as AVs increase in market share. Expanding the safe and considered deployment of AVs is necessary for U.S. automakers and industrial partners to continue developing and scaling related technology here in the United States.

The deployment of AVs into the larger fleet of vehicles on American roads is both an opportunity and a technological challenge that should be addressed at all levels of government and in

cooperation with manufacturers in the United States. Manufacturers are on the cutting edge of vehicle development, but also in auxiliary services and infrastructure related to road markings, equipment and systematic components needed to grow the domestic AV industry into a global economic engine.

AV technology and the expanded deployment of low-emission vehicles can make our roads safer and increase efficiency in the transportation sector. Ensuring that these cutting-edge products are developed and built right here in the U.S. supports manufacturing jobs in America, maintains U.S. competitiveness and enhances U.S leadership in automotive innovation.

Through the exemption petition process, NHTSA can advance its' goals to save lives and prevent serious roadway injuries while improving AV technology development and the deployment of safe, efficient vehicles. Thank you in advance for considering GM's petition for exemption and the related benefits that AVs can provide to improve safety and efficiency.

Comment submitted electronically by:

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