



**American Council  
of the Blind**  
Together for a bright future

1703 N. Beauregard St., Suite 420  
Alexandria, VA 22311  
Tel: (202) 467-5081  
Fax: (703) 465-5085

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*Submitted via regulations.gov*

National Highway Traffic Safety Administration  
United States Department of Transportation  
1200 New Jersey Ave. SE  
Washington, DC 20590

Re: Request for public comment on General Motors petition for temporary exemption, Docket No. NHTSA-2022-0067

The American Council of the Blind appreciates the opportunity to comment on General Motors' (GM) petition for temporary exemption from select standards of the National Highway Traffic Safety Administration (NHTSA) Federal Motor Vehicle Safety Standards (FMVSS) for its autonomous vehicle technology (Docket No. NHTSA-2022-0067). ACB wishes to provide comments on NHTSA's questions regarding accessibility included in its request.

The American Council of the Blind is the nation's leading member-driven organization of and for blind and low-vision individuals. Founded in 1961 and comprised of over ten thousand members and over 65 state and special-interest affiliate organizations, ACB strives to increase the security, independence, equality of opportunity, and to improve the quality of life for all people who are blind and experiencing vision loss. Integral to our mission is ensuring equitable and safe access to public transportation services, including autonomous vehicle technology.

ACB strongly supports Cruise's petition for FMVSS waivers to start development on its Origin vehicle however, we strongly urge NHTSA to create an accessibility mandate as a condition of approval for Cruise's petition. Cruise should be obligated to prioritize accessibility for passengers with disabilities when building its fleet of Origin vehicles. This should include built-in features that increase accessibility for blind and low-vision individuals like smartphone and landline phone access for ordering vehicles, mechanisms for locating a vehicle on arrival like locator tones, haptic smartphone feedback, and on-demand call-in remote assistance for individuals without smartphone or broadband service access, accessible user interfaces inside of every vehicle, including screen reader software, screen magnification, and high contrast on its in-vehicle passenger control system, and safe and accessible modes of entry and egress of Cruise vehicles, including access to curb ramps and sidewalks. In vehicle emergency management mechanisms like emergency manual braking and on-call emergency assistance from the manufacturer should also be fully accessible for passengers with disabilities.

ACB also urges NHTSA to require Cruise to regularly consult with stakeholder organizations like groups representing the disability community in research, development, and eventual deployment of its autonomous vehicles. We commend Cruise on its current level of engagement with our organization, and we invite Cruise to continue its outreach and amplify it to include groups that represent not only blindness but other disabled populations, including but not limited to wheelchair users, deaf and hard-of-hearing individuals, and groups representing people with intellectual and developmental disabilities. Engagement with disabled stakeholders should also be frequent and occur with some regularity. Disabled stakeholders

should feel as though the company is actively listening and responding to their feedback and concerns. Meetings should not be scheduled just to check a box.

In addition to requiring consistent consultation with disabled stakeholders in both research and development, NHTSA should also require GM to collect data on the progress being made in accessibility of its vehicles. GM should collect data on a regular basis on items including but not limited to the progress being made in building an entirely accessible fleet of vehicles, software accessibility of both its in-vehicle user interface and its smartphone application, and accessibility of pickup and drop-off for passengers with disabilities including the ability of vehicles to pull up to a curb or curb cut, ease of locating the vehicle on arrival, and ability for passengers to easily connect to their destination once dropped off. Data should also be collected on injuries, damages, and complaints regarding passenger safety. NHTSA should also collect data on the vehicles' ability to recognize all pedestrians, including those with disabilities, wheelchair users, individuals with mobility aids like canes and guide dogs, and pedestrians of color in all weather and lighting conditions. This data should be made publicly accessible and easily retrievable.

Autonomous vehicle technology has the potential to open doors and increase mobility for individuals with disabilities. People with disabilities, including blindness and low vision, would have increased access to transportation services, especially in underserved areas and areas without fixed-route public transportation. This would enable them to participate more fully in their communities, including being able to travel to and from work and school, access recreational activities, and engage in community activities that improve health and overall quality of life. However, if autonomous vehicles are not fully accessible or individuals with disabilities do not feel safe or comfortable riding them, then any potential benefits are lost. Additionally, if AVs are not safe on public streets or cannot operate safely around pedestrians, then riders will not take advantage of their benefits or of the technology altogether.

The American Council of the Blind strongly supports the deployment of autonomous vehicle technology, and we strongly support GM's petition for exemption from select Federal Motor Vehicle Safety Standards as a means for it to start development on its Origin vehicle fleet. We, however, want to make sure development is taking place in an equitable fashion, and accessibility is a priority for GM in every stage, from research to deployment. If you have any questions on the comments provided or would like to discuss them further, please contact Clark Rachfal, ACB's Director of Advocacy and Governmental Affairs, at either (202) 467-5081 or [crachfal@acb.org](mailto:crachfal@acb.org). Thank you for your time and consideration.

Sincerely,

Clark Rachfal  
Director of Advocacy and Governmental Affairs  
American Council of the Blind