



Mr. Pete Buttigieg  
Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

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

September 21, 2022

**RE: Docket No. NHTSA-2022-0067: Temporary Exemption From Various Requirements of the Federal Motor Vehicle Safety Standards for an Automated Driving System-Equipped Vehicle**

Dear Secretary Buttigieg and Acting Administrator Carlson,

Thank you for the opportunity to provide input on the petition for temporary exemption submitted by General Motors and Cruise regarding the deployment of the “Cruise Origin” autonomous vehicle. Electric autonomous technology promises to shape the future of clean transportation in the United States, an idea I have sought to advance during my tenure in Congress and beyond.

I support the Cruise Origin because, as a zero-emission vehicle powered by renewable energy, the Origin can reduce air pollution in frontline communities as a fully sustainable transportation alternative to gas-powered personal vehicles. Reducing the total number of cars on the road through its shared transportation model and vehicle can mean greater access to affordable mobility for more American communities.

As NHTSA referenced in question 13 of the Petition for Temporary Exemption for Automated Driving System-Equipped Vehicle (Docket No. NHTSA–2022–0067), I believe that this exemption will boost energy efficiency, increase clean miles traveled, and reduce the overall amount of vehicle miles driven. With recent studies showing that a shared AV can replace up to 11 conventional, personally owned vehicles, and the Origin's ability to maximize efficiencies such as dynamic charging to address renewable curtailment and system-wide coordination that allows for lower energy consumption, full U.S. adoption of shared electric AVs could reduce 70% of today's transportation emissions. I recommend approval of this Petition because the Cruise Origin is a purpose-built ridesharing vehicle which will allow the public to access cleaner, sustainable transportation.

Within the United States, 27% of total emissions are from transportation, the single largest contributor to carbon pollution. Researchers from University California at Davis have specifically found that electrifying one full-time rideshare vehicle has the same emissions impact as three private EVs due to travel intensity. Given that traditional vehicles sit idle more than 90% of the time, Cruise's shared transportation model and vehicle will be utilized more than a privately-owned vehicle, serving a much broader segment of the population than just a single owner.

It is essential that autonomous vehicles (AVs) be given the opportunity to develop, given that they offer a much-needed solution in the face of an ever-worsening climate crisis. Electric AV fleets will help bridge the green divide, increasing economic opportunity and bringing new forms of sustainable transportation to traditionally underserved populations. We have a critical opportunity to usher in the AV industry and support this technology as it grows and develops in the United States. I believe the Cruise Origin represents a significant step toward realizing the emissions reductions we need to achieve our nation's climate goals.

Sincerely,  
Hon. Henry Waxman  
Chairman, House Committee on Energy and Commerce, 2009-2011  
Member of Congress, 1975-2015  
Consultant, Cruise