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The Honorable Roger Wicker
Chairman, Senate Commerce, Science,
and Transportation Committee
555 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Maria Cantwell
Ranking Member, Senate Commerce, Science,
and Transportation Committee
511 Hart Senate Office Building
Washington, DC 20510

Chairman Wicker and Ranking Member Cantwell:

Thank you for holding today's hearing, "Highly Automated Vehicles: Federal Perspectives on the Deployment of Safety Technology," to examine the federal government's role in overseeing the safe development of automated vehicle technologies and their significant social and economic benefits. Securing America's Future Energy (SAFE) appreciates the opportunity to submit this letter for the hearing record.

SAFE is a nonpartisan, nonprofit organization committed to reducing U.S. oil dependence to improve American economic and national security. In 2006, SAFE formed the Energy Security Leadership Council (ESLC), a nonpartisan group of business and former military leaders in support of long-term policy toward this goal. The ESLC is co-chaired by Frederick W. Smith, Chairman and CEO of FedEx, and General James T. Conway, 34th Commandant of the U.S. Marine Corps (Ret.).

SAFE believes that automated vehicle (AV) technology presents a significant opportunity to accelerate the market-based adoption of electric vehicles and reduce oil consumption, while also delivering many other public benefits including increased traffic safety and accessibility. Accordingly, we are supportive of policies that will support the safe and expeditious deployment of AVs and maximize their tremendous social and economic benefits.

Significant technological progress has been made in the development and testing of AVs in recent years, leading to early-stage deployments throughout the United States. Recently, some companies have begun to operate AVs in commercial services on public roads without a safety driver.[1] As an executive from another AV company later remarked, "We now live in a post-driverless world."[2]

In sharp contrast, federal policy has struggled to keep pace with the rapid development of AV technology. The existing regulatory framework for motor vehicles was written with human-driven vehicles in mind, resulting in unforeseen barriers to AVs. The federal government does not yet have a unified framework for AV safety, resulting in a lack of regulatory certainty for developers.

Congress has a significant role to play in ensuring that AV technology realizes its full potential to make transportation safer, more efficient, and accessible to all Americans. This begins with creating a federal

[1] https://techcrunch.com/2019/11/01/hailing-a-driverless-ride-in-a-waymo/
[2] https://news.voyage.auto/we-now-live-in-a-driverless-world-cb07a01159c0#_ga=2.55017067.1948161981.1574102920-743940195.1521039822

regulatory framework to guide the safe testing and deployment of AV technology nationwide, while also maximizing their eventual benefits. To this end, we thank the Committee for its leadership on AV START (S. 1885) in the 115th Congress.

While AV START ultimately was not enacted before the end of the last Congress, the need for AV legislation remains as urgent as ever: The status quo on our roadways has not changed. According to the National Safety Council, nearly 40,000 Americans lost their lives in traffic collisions for the third straight year in 2018.[3] Traffic congestion causes Americans to waste a total of 3.3 billion gallons of fuel – plus an average loss of 54 hours per commuter due to delays – every year.[4] Furthermore, six million Americans with a disability have difficulty accessing the transportation they need.[5]

SAFE applauds this Committee and the House Energy & Commerce Committee for launching a joint bipartisan effort to advance AV legislation in this Congress. At a high level, SAFE urges you to consider prioritizing the following three goals in drafting AV legislation:

1) Accelerate progress towards regulatory standards that assure the safety of AVs and eliminate barriers to innovative AV designs.

2) Establish an interim, federal regulatory framework that can improve the governance of AVs until a long-term framework is put in place; this interim framework is critical, as it would govern AVs as they ramp up commercial operation.

3) Advance the societal benefits of AVs to increase transportation access for people with disabilities, wounded veterans, and disadvantaged communities.

At the request of the Committees, SAFE provided detailed policy recommendations for AV legislation in a letter submitted on August 22, which has also been made available on our website.[6]

Thank you again for your attention to the issue of federal AV regulation and your consideration of the tremendous potential of this technology. We look forward to working with you and your colleagues to advance policies that will allow the U.S. transportation sector to thrive in the decades to come.

Thank you,

Robbie Diamond
President and CEO
Securing America's Future Energy

[3] https://www.nsc.org/road-safety/safety-topics/fatality-estimates
[4] https://tti.tamu.edu/news/new-study-underscores-economy-traffic-jam-link/
[5] http://secureenergy.org/wp-content/uploads/2017/01/Self-Driving-Cars-The-Impact-on-People-with-Disabilities_FINAL.pdf
[6] http://secureenergy.org/press/safe-calls-on-congress-to-prioritize-self-driving-legislation/