



September 18, 2020

Hon. Terry Canales
Chair, House Committee on Transportation
Room 4S.4
Austin, TX 78768

RE: House Transportation Committee Formal RFI – Interim Charge Item #3

Dear Chair Canales:

On behalf of the Alliance for Automotive Innovation¹ (Auto Innovators), I am writing to you today in response to the House Committee on Transportation's formal request for information - in particular, interim charge three related to autonomous vehicles (AVs). As you may be aware, Auto Innovators' diverse membership is at the forefront of AV development. Our members continue to support the current legislative environment for AV deployment in Texas and caution against any modifications that could impede the deployment of this potentially lifesaving technology.

Accounting for nearly 700,000 jobs and more than 1.5 billion new vehicles sold in Texas, Auto Innovators' members and our automotive industry partners have invested heavily in the "Lone Star" State. This includes research and development to design and implement state-of-the-art safety systems to protect our customers. Auto Innovators' members and many other companies have been busy testing and developing AV technology throughout the state, and in many different applications.

AV technology is coming at an ideal time where highway fatalities continue at a staggering rate. In 2018, 36,560 people – or 100 people a day -- died in the two million traffic crashes on our nation's roadways. The National Highway Traffic Safety Administration (NHTSA) has found that 94 percent of car crashes are attributable to human choice or error. Using advanced sensors and other technology to further aid or replace human driving, we can

¹ Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. The newly established organization, a combination of the Association of Global Automakers and the Alliance of Automobile Manufacturers, is directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country. Members include motor vehicle manufacturers, original equipment suppliers, as well as technology and other automotive-related companies. Visit our website <http://www.autosinnovate.org>.

dramatically decrease the frequency and severity of these crashes. Unlike conventional human drivers, AVs cannot get distracted, drive impaired or fall asleep at the wheel.

AVs can also provide numerous social and economic benefits, including less congestion, lower fuel consumption, and increased mobility for older adults and people with disabilities. Smart transportation information networks are already helping us get around congestion, increasing efficiency and saving time and resources. They can also extend transportation to those who currently lack access. According to a recent U.S. Department of Transportation study², 25.5 million Americans age five and older have self-reported travel-limiting disabilities. For this portion of the population, increased access to transportation can improve quality of life by increasing independence, enabling people to reach health care and employment opportunities. Fortunately, Texas has become one of the leading states for AV development and testing to find solutions to these real-world problems.

During the 2017 legislative session, Senate Bill 2205 was passed to implement safety requirements and define terms relating to AVs and their operation. While previous statute stopped short of prohibiting AVs, this legislation, sponsored by Senator Kelly Hancock, provided a basic framework for AV developers to test and deploy this lifesaving technology throughout the state. This new statute for AV operation required, but was not limited to, vehicle registration, vehicle insurance, manufacturer liability in the instance of a collision involving an unmodified AV, and compliance with state and federal traffic laws. As a result, the rapid pace of innovation has not only continued across the country, but especially in Texas.

Auto Innovators cautions the State from further expanding the current statute on AVs and placing new burdens on a technology that could provide significant safety, economic and societal benefits. The existing Texas statute is supportive of AV deployment and provides appropriate guardrails to govern the safe operation of AVs on public roads. This approach is vital to the successful deployment of AVs. Elsewhere, burdensome laws have been known to deter companies from deciding to test or operate in a jurisdiction. Auto Innovators continues to support Texas' current legislative environment for AV deployment in Texas, as it is reflective of where the industry is today, and where we anticipate it will be in the near future.

Stakeholder engagement with elected officials and state agencies has been an essential element to fostering the development of AV technology in Texas. Established by Governor Greg Abbott in 2019, the Texas Connected and Autonomous Vehicle Task Force was created to be a designated body to serve as a resource and convener on all connected and automated vehicle activity in Texas. The body has a diverse membership of varying size and focus that will continue to make sure the state is well situated and prepared for the future introduction of driverless vehicle technology. As a member of the Task Force, Auto Innovators supports the efforts of its proactive initiatives and its serving as a filter or clearinghouse for potential legislative or regulatory changes to existing law. With a new

² Travel Patterns of American Adults with Disabilities by Stephen Brumbaugh, US DOT, Office of the Secretary of Transportation, Bureau of Transportation Statistics, September 2018.

legislative session approaching, we believe the Governor's Task Force can be an asset and resource to the legislature, state agencies, and stakeholders.

As the House Transportation Committee continues to take a closer look at Texas's statute governing autonomous vehicles, Auto Innovators would like to reemphasize our support of the current legislative and regulatory framework provided, and we stress caution against expanding it during the 2021 legislative session. The current environment signals that Texas is "open for business" and the robust AV-related activity located throughout the state supports this view. As discussions continue, the Auto Innovators hopes the auto industry will continue to remain a resource and partner with the state.

Thank you in advance for your consideration of our comments. If I can answer any questions or provide any further information, please do not hesitate to contact me.

Respectfully submitted,



Leighton Yates
Director, State Affairs
Alliance for Automotive Innovation

CC: House Committee on Transportation