

April 25, 2017

The Honorable Gerald McCormick
Chairman
House Finance, Ways & Means Subcommittee
206A War Memorial Building
Nashville, Tennessee 37243

SUBJECT: OPPOSE – HOUSE BILL 381 – AUTHORIZES THE OPERATION OF AUTONOMOUS VEHICLES

Dear Representative McCormick:

Global Automakers, www.globalautomakers.org, represents the U.S. operations of international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. We work with industry leaders, legislators, regulators, and other stakeholders in the United States. Our goal is to create public policy that improves motor vehicle safety, encourages technological innovation and protects our planet.

In Tennessee, our members have made, and continue making, substantial investments. To date, **we have invested over \$8.6 billion, directly employ nearly 13,000 people with 12 total facilities including four manufacturing plants** in the state.

Our Position

Global Automakers **opposes HB 381 (Lamberth)**. States should avoid creating a fractured regulatory environment in the United States concerning automated vehicles. In September 2016, the National Highway Traffic Safety Administration offered a measured response, providing “Guidance” for the developers of automated vehicles and considerations for state policymakers. The Guidance recognized that technology will advance more rapidly than regulation.

Despite this clear leadership at the federal level, there have been several state proposals imposing significant barriers to testing and deployment of automated vehicle. States such as California, Nevada, Florida, and Michigan, as well as the District of Columbia, have already enacted laws related to the testing and operation of automated vehicles. Each of these states has taken a slightly different approach to the issue. Erecting barriers to the testing and deployment of automated vehicles at the state level will only hamper investment and innovation in this life-saving technology.

Advancing Vehicle Automation Requires the Right Public Policy

Vehicle automation promises to deliver tremendous societal and lifesaving benefits. Therefore, public policy should foster and support this technology, and not hinder it. Any regulatory framework regarding automated vehicles should have two components: it should be (1) **flexible**, and (2) **national in scope**.

We strongly encourage Tennessee to identify and remove barriers to automated vehicle advancement before establishing new laws. States must tread very carefully in this area, because they may unwittingly do more harm than good. The better approach is to be surgical: identify potential impediments in the statute and fix them.

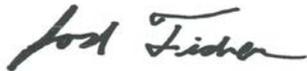
How Tennessee Can Play a Role in Advancing Automated Vehicle Technology

Other states have refrained from enacting such laws, recognizing that complex rules and requirements could have the unintended consequences.

Ohio, for example, has demonstrated how to promote autonomous vehicle testing without the need to enact new laws or rules. The city of Columbus was selected as the first “Smart City Challenge” grant recipient, becoming the first fully integrated connected transportation network in the nation. In addition, Governor Kasich has designated a stretch of US-33 as an innovation corridor and committed state resources to accelerate testing. Finally, Ohio established the “Smart Belt Coalition,” working across state borders to support research and development of automated and connected vehicle technology.

Tennessee can play a similar leadership role without enacting legislation by **(a) identifying any specific impediments or barriers to testing or operation that exist currently in statute, (b) convening key stakeholders and innovators to leverage resources and share best practices, and (c) collaborating with neighboring states to support regional efforts to advance automated vehicle technology while at the same time ensuring a national framework for automated vehicle policy.**

Sincerely,



Josh Fisher
Manager
State Government Affairs