

January 4, 2018

The Honorable Jim Frazier
Chairman
House Transportation Committee
State Capitol
Sacramento, California 95814

SUBJECT: ASSEMBLY BILL 87 - RELATING TO VEHICLES - OPPOSE

Dear Assembly Member Frazier:

The Association of Global Automakers, www.globalautomakers.org, represents the U.S. operations of international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. **Our members have invested over \$4.8 billion, directly employ nearly 11,000 Californians, and sell 57% of new motor vehicles and 72% of green vehicles in the Golden State.**

Global Automakers **opposes Assembly Bill 87 (Ting)**, which would amend Section 38750 of the Vehicle Code to include a requirement that the California Department of Motor Vehicles (DMV) include, at a minimum, certain regulations as it relates to the application for the testing of automated vehicles (AVs) on the road without the presence of a human driver. The legislation proposes to direct DMV to issue a regulation requiring manufacturers certify they have notified local authorities within jurisdictions where an AV will be tested to provide them with certain information, and also includes a requirement that manufacturers provide law enforcement with a law enforcement interaction plan.

Based on the DMV's proposed regulations issued on November 30, 2017, the issues AB 87 seeks to address have already been identified and addressed by the department.¹ More specifically, Sections 227.38 (a) and 227.38(e)(1) through (3) of the proposed regulations would require manufacturers submitting an application for testing vehicles designed to operate without a driver in the vehicle to certify they have notified local authorities and provide a law enforcement interaction plan. AB 87 is unnecessary as it is duplicative of regulations that are expected to be adopted by the department per the requirements of SB 1298 (2012).

There are a number of more significant challenges with respect to the DMV regulations that the legislature should seek to address (e.g. the requirement that a manufacturer obtain a "permit to deploy" automated vehicles, and the definition of deployment). We are prepared to work with the legislature to

¹ California Department of Motor Vehicles' Second Modified Express Terms – Title 13 Division 1, Chapter 1 Article 3.7 – Testing of Autonomous Vehicles, November 30, 2017 (See: https://www.dmv.ca.gov/portal/wcm/connect/aa08dc20-5980-4021-a2b2-c8dec326216b/AV_Second15Day_Notice_Express_Terms.pdf?MOD=AJPERES)

address these challenges and welcome the opportunity to ensure the safe testing and deployment of automated vehicles.

With its spirit of innovation, leading research institutions, technological knowhow and cutting edge technology companies, California possesses the assets to further accelerate automated and connected vehicle technology and position itself at the forefront of this life-saving technology. But an unnecessarily burdensome permit process, unrelated to public policy and public safety objectives, runs directly counter to the innovative spirit that exists in the state.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Damon Shelby Porter
Director, State Government Affairs