

February 27, 2017

The Honorable Curt Friesen  
Chairman  
Transportation and Telecommunications Committee  
Room 1113  
Lincoln, Nebraska 68509

**SUBJECT: OPPOSE – LB 627 – PROVIDE FOR THE OPERATION OF AUTONOMOUS MOTOR VEHICLES**

Dear Senator Friesen:

The Association of Global Automakers represents 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. Our members have made, and continue to make, substantial investments in research and development on automated vehicle technologies.

*Our Position*

Global Automakers is opposed to **LB 627 (Larson)**. This year alone, more than 40 legislative proposals related to automated vehicles have been introduced in the states. These bills often include conflicting definitions of what constitutes an automated vehicle as well as various vehicle requirements that can dictate the way automakers must design and manufacture systems. LB 627 is no exception.

“Autonomous technology”, as defined in LB 627, includes performance standards for automated vehicles. States should not be developing design standards for how automated vehicles should be designed. It is essential that this be the responsibility of the federal government. State adoption of conflicting definitions is leading to a patchwork of requirements for developers and manufacturers of automated vehicles and will stifle innovation.

In September 2016, NHTSA issued its Federal Automated Vehicle Policy (the Policy) to serve as a framework to promote a national approach to ensure the continued advancement of AV technology. Global Automakers believes that the Policy is an important first step toward a consistent national approach for this burgeoning technology. The NHTSA Policy is intended to provide these additional safety assurances, recognizing that technology can advance more rapidly than regulation.

The Policy also includes a Model State Policy seeks to provide recommendations on how state policymakers may help support a uniform nationwide approach. It identifies and defines the important

roles that state governments should consider in addressing issues related to vehicle automation, as well as those areas that are not appropriate for state regulation. We strongly believe standards that impact the design and performance of motor vehicles is a federal responsibility while states maintain authority over issues such as driver licensing, vehicle registration and insurance.

The provisions contained in Section 6 are unworkable and would limit the testing and deployment of automated vehicles where the role of the driver may differ depending upon the design of the system. As previously noted, states should not be in the business of setting vehicle design standards.

*Advancing Vehicle Automation Requires the Right Public Policy*

In light of the tremendous societal benefits that vehicle automation can provide, Global Automakers believes that it is critically important that public policy supports and spurs advances in this lifesaving technology, and does not erect unnecessary barriers. This regulatory framework should have two components:

First, it should be flexible and allow manufacturers to develop, test, and market new systems that will provide broad societal benefits. A formal and overly-prescriptive program simply cannot keep up with the pace of innovation.

Second, automated vehicle policy should be national in scope and allow manufacturers to build vehicles that can be tested, sold and operated in all fifty states. A patchwork of state laws establishing inconsistent design and performance criteria for AVs will delay the delivery of real-world safety benefits to the American public and would be unworkable for the industry. It could in theory even mean that people in different states will not have the same access to the latest crash-avoidance technologies.

**LB 627 in our view does not meet this framework.**

*LB 627 is Unnecessary and Could Erect Barriers to Automated Vehicle Testing and Deployment*

Other states have recognized that complex rules and requirements could have the unintended consequence of slowing down innovation. States such as Ohio and Virginia have demonstrated how to promote autonomous vehicle testing without the need to enact new laws or rules. Nebraska should follow this example, using the Model State Policy as guidance without codifying its terms.

Sincerely,



Josh Fisher  
Manager  
State Government Affairs