



**Date:** February 12, 2018  
**To:** House Transportation Policy Committee  
**From:** Self-Driving Coalition for Safer Streets  
**Re:** House Bill 4063

The [Self-Driving Coalition for Safer Streets](#) was founded by Ford, Lyft, Uber, Volvo Cars, and Waymo. The Coalition is comprised of companies with technical expertise and experience in the technology, automobile, and transportation network sectors. Despite their different backgrounds, the companies formed the Coalition to bring the tremendous potential safety benefits of autonomous vehicle (AV) technology to consumers in the safest and swiftest manner possible.

The Coalition believes states will play a critical role in the deployment of AV technology, and we are encouraged that state legislators recognize its significance. Given the Coalition's enthusiasm for fully autonomous vehicles and our strongly held view that they have the potential to change the country for the better, we support efforts at the state level to facilitate the rapid testing and deployment of fully autonomous vehicles.

The Coalition has had the opportunity to review the -1 amendment to House Bill 4063, and our members are aware that there is an intention to remove Section 2 of that -1 amendment. As such, we will confine our request for further amendments to the task force section of the -1 amendment.

**Section 3(2) Task force membership – Delete “The cybersecurity industry.”** Motor vehicle security and privacy are both areas in which federal agencies already have existing jurisdiction, including the National Highway Traffic Safety Administration (NHTSA) and the Federal Trade Commission. NHTSA has issued guidance on motor vehicle security in 2016, has included parallel guidance in Automated Driving Systems 2.0, and has enforcement authority for any motor vehicle defects -- including those relating to security flaws or privacy issues. In addition, cybersecurity and privacy provisions have already been included for autonomous vehicles in federal legislation under consideration.

**Section 3 (3)(a) Task force legislative recommendations – Include reference to “with or without human operators.”** The technological goals of self-driving cars are to safely operate without a human driver, and the task force should consider what specific changes to existing law, if any, are needed to realize this goal.

**Section 3 (3)(b)(D) Move “liability” reference to “potential long-term effects of autonomous vehicle deployment.”** Industry believes that existing tort law in the state sufficiently addresses liability for motor vehicles -- including fully self-driving vehicles that never involve human control. Existing tort law is well equipped to handle new technologies, and it is not necessary or desirable to address liability issues on a product-by-product basis. We request

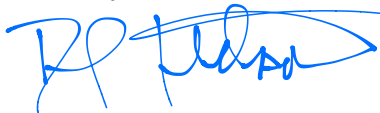
that the liability language be moved into a long-term effects analysis for the task force, to clarify that it is not mandatory that any recommended legislation include provisions on liability.

**New Section 3 (3)(b)(E) Add “Compliance with Rules of the Road”.** The Coalition recognizes that many jurisdictions that have adopted laws explicitly allowing fully self-driving vehicles to operate without a human driver have included a requirement that those vehicles be capable of complying with existing, generally-applicable rules of the road. We would therefore support adding language affirming that the task force would consider compliance with rules of the road.

**Section 3 (12) The task force should be sufficiently resourced from an agency staff perspective to carry out its work.** The Coalition has recommended that the task force be given the option to seek counsel from the state Department of Justice if legal assistance is needed.

Thank you for your consideration of our request for amendments to House Bill 4063. Should this legislation become law, we look forward to working with the task force authorized by this bill.

Sincerely,

A handwritten signature in blue ink, appearing to read "David L. Strickland", with a stylized flourish extending to the right.

Hon. David L. Strickland  
Counsel, Self-Driving Coalition for Safer Streets