

CITY OF LOS ANGELES

CALIFORNIA

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February 10, 2020

The Honorable Cathy McMorris Rodgers,
Ranking Member
House Energy & Commerce Subcommittee on
Consumer Protection & Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Janice Schakowsky, Chair
House Energy & Commerce Subcommittee on
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2125 Rayburn House Office Building
Washington, DC 20515

Re: Consumer Protection and Commerce Subcommittee Hearing on Autonomous Vehicles

Cities and states alike will benefit from federal policy that ensures Autonomous Vehicle (AV) safety and demonstrates technology readiness. Safe testing and deployment will be advanced by new Federal funding sources that allow local jurisdictions to develop both physical and digital Connected/Autonomous Vehicle (CAV)-enabling infrastructure in urban, suburban, and rural environments. However, cities and states need time to develop pilot programs to identify use cases and best practices before federal legislation can be designed to drive local outcomes. Given that most AV testing takes place within local jurisdictions and does not cross state lines, federal legislation that extends beyond vehicle and technology safety, new funding sources, and data standardization may be premature.

As regulators of safety performance benchmarks and vehicle and equipment standards, the federal government should collect detailed data on AV collisions, crashes, near-misses, disengagements, and equipment failures. This data must be shared with cities and other stakeholders in a standardized format at regular intervals to provide useful data to regulators, decision makers, and researchers. This will ensure AVs are providing safety benefits and not posing additional risks to other roadway users including pedestrians and bicyclists, and determine whether approved pilots support or undermine local policy goals. Federal legislation should not preempt cities from requiring disaggregated data from operators, provided data protection and confidentiality protocols are in place. Federal AV legislation should look to cities for best practices, since they are incubating pilots for emerging technologies like AVs in real time.

The City of Los Angeles fosters innovation and builds partnerships with industry leaders. The Los Angeles Department of Transportation (LADOT) recognizes the potential for autonomous transportation to improve safety, provide access to mobility options, and achieve environmental goals. We also know that whether those goals become reality relies on outcome driven regulations. Regulators and policy makers

must plan for an autonomous future and develop regulatory frameworks to ensure these innovations benefit everyone.

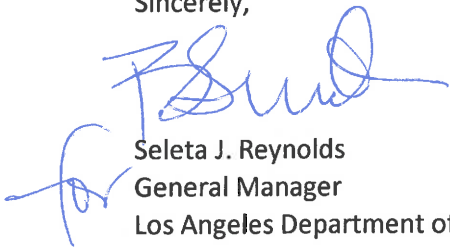
Autonomous Vehicles present an opportunity to develop transformative technology from the ground up with public interest embedded in every decision. This new technology should help us eliminate traffic deaths and serious injuries, improve access to opportunities for all families, reduce our carbon footprint, improve public transportation, and reduce congestion.

The state of California is actively piloting autonomous technology and developing regulations to govern AV passenger service. The City of Los Angeles is also implementing a number of key initiatives to prepare for autonomy. LADOT is learning how to digitally manage for-profit companies with real time data from services like dockless scooters and e-bicycles to ensure vehicles are safe, equitable, and help improve everyone's quality of life. As new connected, shared, and eventually autonomous technology reaches our streets, we'll be more prepared based on our lessons learned. We're also creating a code based inventory of parking assets and regulations so that we can communicate digitally and automatically with AVs about parking availability and building strong coalitions with the private sector to develop additional digital tools and prepare for future modes.

Cities are responsible for maintaining safety and protecting equitable access to the public right of way. Cities must retain the right to regulate, design, and allocate use of the public right-of-way, including curb use pricing, mobility permitting, and data sharing requirements. To maintain control of their streets, it is critical that cities retain their ability to establish data requirements for new modes delivered by for-profit companies that leverage public assets at no cost and with little accountability. This includes AV integration into cities' communication channels, APIs, and digital platforms.

Thank you for the opportunity to comment.

Sincerely,



Seleta J. Reynolds
General Manager
Los Angeles Department of Transportation