SECURING AMERICA'S
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Securing America's Future Energy

May 23, 2019

The Honorable Frank Pallone
Chairman, Energy and Commerce
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Greg Walden
Ranking Member, Energy and Commerce
2322 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jan Schakowsky
Chairwoman, CPAC Subcommittee
2367 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Cathy McMorris Rodgers
Ranking Member, CPAC Subcommittee
1035 Longworth House Office Building
Washington, D.C. 20515

Chairman Pallone, Ranking Member Walden, Chairwoman Schakowsky and Ranking Member McMorris Rodgers:

Thank you for holding today's hearing on the critical need to improve safety on the nation's roadways in order to protect American drivers and their families.

Securing America's Future Energy (SAFE) appreciates the opportunity to submit this letter of record. SAFE is a nonpartisan nonprofit organization committed to reducing U.S. oil dependence to improve U.S. economic and national security. Recent innovations in transportation technology hold enormous potential for increasing roadway safety while expediting the United States' ability to reduce oil dependence by improving efficiency and diversifying fuel choice in our transportation sector.

All across the nation, Americans are currently planning their summer vacations – many of which will involve the time-honored tradition of a road trip with family or friends. For many Americans, these vacations become cherished memories of setting out on roads across the country to enjoy time with their loved ones.

Unfortunately, some of these trips will end in tragedy. Driving is the least safe way to travel, compared to all other major modes of transportation; car travel has the highest fatality rate when measured by the number of fatalities per passenger mile. In 2018, for the third straight year, nearly 40,000 American lives were lost on our roadways – of those, 10,000 were connected to drunk driving collisions.[1,2]

Fatalities increase during the summer months as Americans drive more miles, which is only compounded by increased rates of driving under the influence of alcohol around holidays. During the approaching Memorial Day Weekend, the National Safety Council estimates that 380 Americans may die on U.S. roads.[3]

[1] National Safety Council, "Vehicle Deaths Estimated at 40,000 for Third Straight Year." NSC.org, February 13, 2019
[2] National Safety Council, "Impairment Begins With the First Drink." NSC.org.
[3] National Safety Council, "Holiday Traffic Fatality Estimate - Memorial Day." NSC.org

While there is no silver bullet for traffic safety, many deaths can be prevented through a range of technologies and policies that can be adopted or implemented today. Advanced driver assistance systems (ADAS), which includes features like automatic emergency braking (AEB), forward collision warning, and lane departure warnings, can augment the safety of vehicles on the road. Additionally, these technologies hold the potential for significant system-wide fuel economy savings.[4]

Since 94 percent of fatal collisions can be attributed to human error or choice, the advent of autonomous vehicle (AV) technology has the potential to further enhance roadway safety. Unlike humans, AVs are not capable of driving under the influence, can be programmed to obey traffic laws and speed limits, and cannot be distracted. SAFE's research has found that AVs will also unlock $800 billion dollars in annual social and economic benefits by 2050.[5]

Quantified Benefits of Autonomous Vehicles

Public Benefits by 2050 (annual)	**$633 Billion**
Congestion Mitigation	$71 Billion
Accident Reduction – Economic Impact	$118 Billion
Accident Reduction – Quality of Life Improvements	$385 Billion
Reduced Oil Consumption	$58 Billion
Consumer Benefits by 2050 (annual)	**$163 Billion**
Value of Time	$153 Billion
Reduction in Cost of Current Taxi Service	$10 Billion
Total Annual Benefits (by 2050)	**$796 Billion**

Source: David Montgomery, *Public and Private Benefits of Autonomous Vehicles*, June 2018.

While the private sector continues to make significant progress in the technological development of AVs, Congress and the U.S. Department of Transportation must also work to develop the appropriate policy framework to accommodate their safe and expeditious deployment.

We would like to thank the subcommittee for its leadership on the bipartisan SELF DRIVE Act (H.R. 3388) in the previous Congress. While it was not enacted, the SELF DRIVE Act would have established a modern and flexible regulatory framework to spur innovation in the private sector while implementing guardrails for the safe testing and deployment of AVs on public roads. Additionally, SELF DRIVE would have ensured that the full range of benefits would be realized by all Americans – including the millions of seniors, people with disabilities, and wounded veterans who experience significant mobility challenges.

We strongly urge you to expediently consider and pass similar legislation this year to ensure that Americans are able to realize the full safety benefits of AVs as soon as possible. In drafting this legislation, we respectfully request that the committee consider including the following provisions:

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[4] Amitai Bin-Nun, "Using Fuel Efficiency Regulations to Conserve Fuel and Save Lives by Accelerating Industry Investment in Autonomous and Connected Vehicles." Securing America's Future Energy, April 2018.

[5] Amitai Bin-Nun, Jeff Gerlach and Alex Adams, "America's Workforce and the Self-Driving Future." Securing America's Future Energy, June 2018.

1. **Reinforcing the authority of the National Highway Traffic Safety Administration (NHTSA)** as the nation's sole regulator of motor vehicle design, construction, and performance through measured preemption language. This should enable states and localities to continue fulfilling their traditional roles, including setting and enforcing traffic laws.
2. **Modernizing Federal Motor Vehicle Safety Standards (FMVSS)** by setting timelines for NHTSA to update outdated regulations that were written with only human-driven vehicles in mind. Setting timelines will create urgency for the agency without setting standards prematurely and hampering innovation.
3. **Reforming the FMVSS exemption process** in order to accelerate the safe introduction of innovative vehicles designs that improve transportation access, fuel efficiency, and fuel diversity.
4. **Leveling the playing field** between established automakers and new entrants such as technology and transportation network companies. Policy neutrality for technologies and business models is essential to unleashing the full potential of American innovation.
5. **Ensuring that the full benefits of AVs will be realized by people with disabilities,** especially through language that would preempt states from imposing discriminatory laws that would not allow people with disabilities to operate AVs without a driver license.

Thank you again for your attention to the critical issue of traffic safety. The status quo – 40,000 American lives lost every year and millions more injured – is unacceptable and the costs are far too great to delay action. We look forward to working with you, your colleagues, and fellow stakeholders to accelerate the adoption of lifesaving vehicle technologies.

Thank you,

Robbie Diamond
President and CEO
Securing America's Future Energy