



**TECHNET**  
THE VOICE OF THE  
INNOVATION ECONOMY

805 15th Street, NW, Suite 708, Washington, D.C. 20005  
Telephone 202.650.5100 | Fax 202.650.5118  
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February 10, 2020

The Honorable Janice Schakowsky  
Chairwoman  
Subcommittee on Consumer Protection  
and Commerce  
2367 Rayburn House Office Building  
Washington, D.C. 20515

The Honorable Cathy McMorris Rodgers  
Ranking Member  
Subcommittee on Consumer Protection  
and Commerce  
1035 Longworth House Office Building  
Washington, D.C. 20515

Dear Chairwoman Schakowsky, Ranking Member McMorris Rodgers, and Members of the Subcommittee on Consumer Protection and Commerce:

Thank you for conducting Tuesday's important hearing entitled, "Autonomous Vehicles: Promises and Challenges of Evolving Automotive Technologies." TechNet strongly supported bipartisan legislation passed unanimously by this committee and the entire U.S. House of Representatives in the previous Congress that would have created a national framework for the safe deployment of this technology. While we were disappointed a similar effort fell short in the Senate, we are encouraged by the bipartisan, bicameral efforts currently underway to ultimately pass a bill in 2020 that will cement America's global competitive advantage in this evolving technology.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents over three million employees and countless customers in the fields of information technology, e-commerce, the sharing and gig economies, advanced energy, cybersecurity, venture capital, and finance. Our membership also includes several innovative companies dedicated to developing and deploying and autonomous vehicle (AV)-related technology, including General Motors, Lyft, Uber, Waymo, Argo AI, and Aurora, among others.

Self-driving vehicles hold enormous promise to save lives, provide greater mobility and freedom to elderly Americans and persons with disabilities, and create jobs. According to the National Highway Traffic Safety Administration (NHTSA), there were 36,560 deaths on America's roads and highways in 2018; and it is estimated that human choice or error is a factor in approximately 94 percent of all motor vehicle crashes. AV technology holds great promise for reducing or eliminating these human factors, and thereby potentially reducing injuries and fatalities on our roadways.

Innovations in self-driving vehicle technology have led state legislatures and regulators to respond with common-sense safety proposals, but also many unnecessary burdens that are creating a 50-state patchwork of conflicting policies, which threaten the safe deployment of this technology on a national basis. As American companies continue to make advancements in this technology, the federal government has a proper role to play in developing uniform standards in areas where it makes sense, ensuring that self-driving cars will be safe for the road.

Given how important the safe deployment of AV technology is to the American public, our members, and to the innovation economy as a whole, **we expect that this hearing will be useful in demonstrating the key issues that have broad support and also hope that the Subcommittee will ultimately limit the scope of the bill to the following three core components necessary for safe deployment: preemption, exemptions, and expedited rulemaking.** In short, we urge the Subcommittee to avoid potentially divisive issues that are not fundamentally critical at this stage to testing and deployment and could only serve to upend any bipartisan, bicameral endeavor this year.

To this end, TechNet believes that the federal government, specifically the National Highway Safety Administration, should set a uniform standard for AVs related to design, construction, and performance, just as it does now for other motor vehicles. Moreover, it should be clarified that states and municipalities will continue to play the same role they do now under federal law with respect to traffic regulations, licensing of vehicles, and liability.

In the pendency of federal AV-related rulemaking, it is essential for there to be an interim regulatory mechanism to support the deployment of AVs, which should be accomplished through an expansion of the Transportation Secretary's existing exemption authority. TechNet believes that Congress should expand the scope of exemptions to permit the deployment of commercially meaningful volumes of AVs for sufficient durations that would have the benefit of producing real world deployment data necessary for NHTSA to conduct AV rulemaking. While there is no guarantee that the Secretary would grant an exemption, they would simply retain the discretion to grant, informed on the basis of public notice and comment, an exemption if it is determined to meet the safety or other criteria associated with it.

Finally, the success of AV technology rests in large part on the federal government creating and implementing safety standards through an established process that allows for public input and congressional oversight. AV technology, although still in its early stages, is rapidly evolving, and we should not lose the opportunity to cement the United States as the global leader.

We look forward to continuing to work with you on this important issue and hope you will not hesitate to reach out to Peter Chandler, Director of Federal Policy and Government Relations, at [pchandler@technet.org](mailto:pchandler@technet.org) if we can be a resource to you and your staff.

Sincerely,

A handwritten signature in blue ink that reads "Linda Moore". The signature is written in a cursive, flowing style.

Linda Moore  
TechNet President and CEO