



## **Consumer Federation of America**

**Statement of  
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Submitted to  
Committee on Energy and Commerce  
In Reference to the Committee's Hearing on  
"Autonomous Vehicles: Promises and Challenges of Evolving Automotive  
Technologies"  
February 11, 2020**

Autonomous vehicles (AVs) have the potential to be a technological vaccine that could dramatically reduce the tragic toll that autos take on our society. However, like any successful vaccine, they need to be thoroughly tested to specific standards, before they are made available to the public. Given the failure of the U.S. Department of Transportation's National Highway Traffic Safety Administration to aggressively set standards and procedures for the introduction of AVs, we are calling on Congress to step in and require NHTSA to do so. Insuring the safe and thoughtful introduction of AVs onto American roads is the only path forward to insuring their success. As noted in a recent poll by Advocates for Highway and Auto Safety, consumer concern about AVs is high. As such, even a small number of failures will further increase consumer anxiety and delay the safe introduction of these potentially lifesaving products.

In addition to setting performance standards, issues related to privacy, data availability, government oversight, and transparency must be a top priority in Congress' effort to ensure safe and efficient autonomous vehicles.

Because AVs will be tracked and monitored, regulations are needed to ensure that this information remains the property of the consumer. Furthermore, because of the bandwidth being allocated to AV communications, we are concerned that much of it will be used for commercialization, which will seriously annoy consumers and increase the already growing problem of distracted driving.

As they operate, AVs will be collecting tremendous amounts of technical and performance data – information vital to the independent analysis of the efficacy of the various AV operations. This information needs to be made

publically available. Independent experts need to assess AV capabilities. Consumers need it to make informed purchase decisions regarding AVs, which likely will have various features and performance levels.

One of the best ways to educate consumers about this new technology is to make safety information about driverless cars easily available online. It's no surprise that the vast majority of consumers want this information. And it is especially important with AVs because there are currently no standards set by the DOT that make it clear what AV features can, and cannot, do. This database must also let consumers know which AVs are exempt from federal safety standards.

The good news is that the DOT has a system in place. Safercar.gov provides vehicle safety information and the ability to look up recall information by VIN. Congress should require that manufacturers submit AV feature information to DOT by VIN number so it can reside in this already created system. This will enable the over 60 million American's who buy new and used cars to precisely determine the features of a particular AV. Furthermore, such public exposure will serve to stimulate competition in developing the very best AV features.

Finally, for there to be effective oversight of these extraordinarily complex and highly technical products, Congress must mandate, and provide funding for, the National Highway Traffic Safety Administration to establish an AV oversight division within the agency staffed with the technical know-how needed to both understand and monitor this new technology. Right now, the Agency is incapable of overseeing AV technology even if it wanted to. Without such an effort, the car and tech companies will continue to push AVs onto American roadways and set their own standards. Given the serious recalls by the car companies and the data breaches by the tech companies, this is a recipe for disaster. For AVs to reach their full potential as a lifesaving addition to America's highways, there must be thoughtful and effective regulatory oversight.

The Consumer Federation of America is calling on Congress to require comprehensive performance standards, protect privacy, insure full transparency about real world performance, and set the stage for the safe introduction of autonomous vehicles. Critically important to this effort is providing the NHTSA with the resources and tools it needs to carry out this Congressional mandate. We look forward to working with members of Congress in this effort.