



August 22, 2022

Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
West Building
Washington, DC 20590

Re: NHTSA-2022-0066

Dear Acting Administrator Carlson:

The U.S. Chamber of Commerce (“Chamber”) writes today regarding Ford Motor Company’s (“Ford”) exemption petition, which will help accelerate the widespread deployment of automated vehicle technology and enhance the benefits this technology will bring to the United States.

Automated vehicle technology presents a broad range of societal benefits, of which safety is the most important. Implementation of automated vehicle technology promises to reduce motor vehicle crashes and save lives. In the first half of 2021, an estimated 20,160 people died in motor vehicle crashes nationwide, up 18.4% over 2020; these deaths were caused largely by human error and behavior. By reducing these human errors, automated vehicle technology will save lives. Moreover, automated vehicle technology will provide significant economic benefits for American consumers and strengthen U.S. global competitiveness.

The United States risks losing its technological leadership in the automated vehicle industry unless it effectively utilizes existing regulatory tools and enacts new policies to protect its leadership in the development, manufacture, and deployment of automated vehicles against global competitors, specifically China and Europe.

The National Highway Traffic Administration (“NHTSA”) has the authority to issue exemptions from existing Federal Motor Vehicle Safety Standards (“FMVSSs”) for unconventional motor vehicle designs. The current FMVSS were written at a time in which automated vehicle technology was not a consideration and, thus, are predicated on a human driver having control of the vehicle. The Chamber believes that

the exemption process thus serves as one critical tool to help enable the safe and widespread deployment of automated vehicles.

Obtaining an exemption requires an automated vehicle developer to provide extensive information and data on the proposed motor vehicle design, and the petitioner would have to show that the proposed design meets or exceeds the level of safety provided by the standard for which the exemption is sought. This ensures that a high level of safety is maintained, and passengers and the public remain protected. Furthermore, the Chamber notes that granting an exemption petition does not exempt the petitioner from certifying or being responsible for its vehicles' safety performance and thus does not undermine motor vehicle safety.

NHTSA's stated mission is to save lives and to prevent injuries. By encouraging new innovations like automated vehicles, it can achieve those objectives. Presuming Ford's petition meets the agency's safety requirements, the Chamber encourages NHTSA to favorably grant the petition. Moreover, NHTSA should fully account for the benefits of automated vehicle technologies when considering the petition and evaluate the petition in a timely manner to ensure regulatory certainty for the petitioner. Granting companies like Ford with the tools they need, such as exemptions, to safely test and deploy automated vehicles across the United States is clearly in the public interest. In addition, a successful exemption request will help create high quality jobs, incentivize continued research and development, and generate significant investment in the United States.

NHTSA should strongly consider Ford's petition for exemption and the associated benefits of automated vehicle technology that serve the public interest. Thank you for your attention to this matter, and please reach out to Matt Furlow at mfurlow@uschamber.com if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jordan Crenshaw". The signature is written in a cursive, flowing style.

Jordan Crenshaw
Vice President
Chamber Technology Engagement Center
U.S. Chamber of Commerce