



April 3, 2023

The Honorable Robin Hutcheson  
Administrator  
Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue SE  
West Building  
Washington, DC 20590

**Re: Request for Comments, Federal Motor Carrier Safety Administration, U.S. Department of Transportation; Parts and Accessories Necessary for Safe Operation; Exemption Application From Waymo LLC, and Aurora Operations, Inc. (88 Fed. Reg. 13,489-13,490, March 3, 2023)**

Dear Administrator Hutcheson:

The U.S. Chamber of Commerce (“Chamber”) writes today regarding Waymo L.L.C. and Aurora Operations Inc.’s exemption petition (“petition”), which will help facilitate the nationwide deployment of automated freight and enhance the numerous benefits this technology will bring to the United States.

Automated vehicle technology, including automated freight, 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. Moreover, automated freight will provide significant economic benefits for American consumers and businesses and strengthen U.S. global competitiveness. However, 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, manufacturing, and deployment of automated vehicles against global competitors.

The Federal Motor Carrier Safety Administration (“FMCSA”) has the authority to issue exemptions from existing Federal Motor Carrier Safety Regulations (“FMCSRs”) to allow for alternative methods of regulatory compliance. The current regulations were written at a time in which automated vehicle technology was not a consideration. Therefore, the current rules are predicated on human driver hand-placing warning

devices within vehicles and should be adapted to reflect new and emerging technologies. However, some automated freight solutions, such as those proposed by the petitioners, will require a flashing light-based system necessitating an exemption. The exemption process can thus serve as a critical tool to help facilitate innovative solutions to enable the safe deployment of automated freight.

Obtaining an exemption requires a petitioner to provide extensive information and data on the proposed alternative, 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 protect the vehicle and its driver as well as other motorists.

FMCSA's stated mission is to save lives and to "reduce crashes, injuries, and fatalities" involving motor carriers. By encouraging new innovations like automated vehicles, it can achieve those objectives. Presuming the underlying petition meets the agency's safety requirements, the Chamber encourages FMCSA to favorably grant the petition. Moreover, FMCSA should fully account for the benefits of automated freight when considering the petition and evaluate the petition in a timely manner to ensure regulatory certainty for the petitioner. Granting companies like Aurora and Waymo 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. A successful exemption request will help create high quality jobs, lay the groundwork for modernizing FMCSRs, incentivize continued research and development, and strengthen the flow of interstate commerce.

FMCSA should strongly consider this petition for exemption and the associated benefits of automated freight 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](mailto:mfurlow@uschamber.com) if you have any questions.

Sincerely,



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