



March 22, 2021

Secretary David Kim
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Re: California State Transportation Agency Autonomous Vehicles Strategic Framework

Dear Secretary Kim:

On behalf of the transportation and logistics industry, we are pleased to submit these comments regarding the California State Transportation Agency's ("CalSTA") Autonomous Vehicles Strategic Framework Draft Vision and Guiding Principles ("AV Strategic Framework" or "Framework" or "Draft") circulated last month.

The coalition submitting this letter includes autonomous truck developers, carriers, shippers, original equipment manufacturers, and trade groups—each with an interest in the significant and diverse benefits presented by autonomous truck technology. We have come together in drafting these comments out of our shared commitment to usher the promise of autonomous trucking in the safest and swiftest manner possible.

In 2020, California and the nation saw first hand the fundamental importance of a well functioning freight and logistics ecosystem in a way many consumers had not previously experienced. The freight industry provides the state and nation with its most vital needs, from food and vaccines to raw materials. With that responsibility comes the moral obligation to strive for the safest and most efficient means of moving freight. While the freight industry undergoes its own transformation in the midst of a changing economy, increasing demand for goods movement and the speed of that movement, and climate change, technological advancements in autonomy present tremendous potential to raise the bar for long-haul trucking.

In the coming years, autonomous trucks will fundamentally change the manner and speed in which goods move in our country while making roads safer for everyone. This technology also presents an array of environmental benefits, including greater fuel efficiency, reduced congestion, reduced agricultural spoilage and related preservation of soil and water resources, and accelerated zero-emission commercial vehicle adoption among fleets in complementing segments of the supply chain.

We appreciate CalSTA's efforts to lead on this issue and engage in big-picture thinking around autonomous vehicles, including providing industry and technology leaders with the opportunity to provide feedback on its initial AV Strategic Framework. Generally, the Draft reflects a comprehensive list of laudable aspirations for passenger AVs, last mile delivery vehicles, and the ways they each interact with the state's transportation system more broadly. However, in its current form, the Draft's Guiding Principles are so focused on passenger vehicles and last-mile delivery services, they fail to acknowledge or allow for how automated trucks can contribute to each stated aspiration of our transportation system. We urge CalSTA to take a more holistic approach to modernizing our transportation system by specifically noting in the AV Strategic Framework the importance of autonomous trucking to California's future prosperity and the ways this technology can help achieve its Guiding Principles.

Outside of its AV Strategic Framework Draft, CalSTA has historically been supportive of how autonomy will bolster the freight sector. CalSTA's California Freight Mobility Plan 2020 (CFMP) specifically highlights the potential for automation to benefit the transportation system through improvements in efficiency, reliability, and safety. Autonomous trucking also directly benefits many of the CFMP 2020 goals, including multimodal mobility, economic prosperity, environmental stewardship, healthy communities, and safety. For example, with regard to multimodal mobility, long-haul automation increases network efficiency by reducing travel time when trucks need only stop for fueling and reduces congestion when trucks are capable and willing to travel during off hours. Economic prosperity is also bolstered by an increased demand for short-haul jobs and expanded potential for ground freight transportation as a whole. Those benefits cannot be harnessed toward CFMP goals unless CalSTA prioritizes trucking automation in its AV strategy.

In its current form, the Framework Guiding Principles' silence on autonomous trucking is concerning and could inhibit California's transportation system, environment, and law enforcement from taking full advantage of the benefits presented by this technology. Especially given the near term deployment timelines of this technology, CalSTA must make clear that autonomous trucking is a priority in AV planning by explicitly naming it as such in the Framework.

We also encourage CalSTA to engage with the freight sector as recommended in its CFMP. CalSTA should list commencing DMV's heavy-duty AV testing and commercial deployment rulemaking as an immediate action item to the AV Strategic Framework. Today, more than a dozen U.S. companies, including startups, established technology firms, and traditional truck manufacturers developing autonomous Class 8 trucks are excluded from the California DMV's autonomous vehicle program and therefore prohibited from testing above Level 2 within the

state. This nearly decade long delay has already pushed some developers to leave the state, while presenting California-based shipping and fleet partners with less opportunities to prepare for how the technology can bolster current operations. Commencing this rulemaking, as required under CVC § 38750, is the necessary first step toward providing the broad and diverse benefits of long-haul automation to all Californians.

We appreciate the opportunity to provide comments on CalSTA's draft Strategic Framework on Autonomous Vehicles. We also appreciate the numerous opportunities CalSTA and agency staff have taken to garner information on autonomous trucking technologies. We are confident CalSTA has sufficient information to move forward with these recommendations but, as always, please feel free to reach out to our companies with any further questions.

Aon
American Trucking Associations
Aurora
AUVSI
California Chamber of Commerce
California Trucking Association
Consumer Technology Association
DHL
Embark Trucks
Kodiak Robotics
Locomotion
Microsoft
NVIDIA
Omnitracs
Self Driving Coalition for Safer Streets
Silicon Valley Leadership Group
TechNet
The National Star Route Mail Contractors Association
TuSimple
University of California, San Diego
UPS
US Chamber of Commerce, Technology Engagement Center
US Xpress
Waymo