



October 24, 2017

U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Room W12-140
Washington, DC 20590

RE: Automated Driving Systems: Voluntary Safety Self-Assessments; Docket ID: NHTSA-2017-0086

The American Association of Motor Vehicle Administrators (AAMVA) appreciates the opportunity to provide comments regarding the Voluntary Safety Self-Assessment (VSSA) as laid out in *Automated Driving Systems 2.0: A Vision for Safety*. These voluntary safety self-assessments are essential in providing state and local governments with a publicly-filed submission on how an entity intends to introduce these life-saving technologies in a responsible manner. AAMVA shares the following comments on how the voluntary self-assessments can best be effectively submitted and utilized.

Access to Safety Assessments

AAMVA recommends that NHTSA consider the establishment of a centralized, single-source repository for safety assessments that will allow states and other entities to locate and review submitted assessments. This will assist jurisdictions by ensuring they have access to any submission provided by an entity once a submission has been filed, and further ensure agencies are not wasting valuable time and resources in locating an assessment that has not been voluntarily filed. The establishment of a single-source clearinghouse will also ensure that any updates provided for a previously filed assessment will also be published in the same location, making the most recent assessment submitted for the same product readily visible and available.

AAMVA recommends that where feasible, the submitted assessments be timestamped and provide direct links to any additional or supplementary documentation not directly incorporated into the assessment. Further, AAMVA requests consideration of the repository's capability to register users for electronic notification when an assessment has been added or updated (additionally with timestamps), and that this capability be included in the functionality of the clearinghouse. These important consideration will improve public acceptance and facilitate the ability to actively monitor clearinghouse entries in an orderly fashion.

Use of Safety Assessments by Jurisdictions

AAMVA members primarily envision the use of the safety assessment to advance their knowledge of:

- The type, number and scope of the vehicles that are being tested in their state.
- An entity's focus on safety.

- The process used to assess safety and mitigate risks.
- Consumer education and training materials relative to vehicle capabilities and its integrated technology.
- Compliance with federal, state and local laws.
- Law Enforcement and First Responder communication and training.

Information Helpful to Jurisdictions

With regards to the content of the report, AAMVA members recommend the inclusion of in-depth information about the 12 safety elements NHTSA has detailed in its *Automated Driving Systems 2.0: A Vision for Safety*. Submissions should include information beyond a simple affirmation that a safety element has been considered or generally addressed and should include specific information on how the entity fully intends its products to provide a level of safety adequate to satisfy expected levels of performance. AAMVA is confident that entities would be able to provide information on how their products achieve a level of expected safety equivalency without having to disclose identifying proprietary information. AAMVA and its membership are fully aware of the delicacy with which proprietary information must be handled, and reiterate that submitted information should not compromise individual entity's ability to submit a voluntary safety self-assessment.

AAMVA requests the inclusion of information specific to each vehicle model in VSSA submissions. Information accompanying each VSSA submission by vehicle model should include any information on compliance with, or exceptions to, any Federal Motor Vehicle Safety Standards (FMVSS) and information on any active recalls associated with the vehicle model. Finally, AAMVA recommends that the VSSA should also include a summary of test results associated with the vehicle model, again with the understanding that the VSSA not require disclosure of proprietary information.

Additional information the jurisdictions would find helpful for inclusion in the VSSA:

- The number of vehicles being tested on public roadways and the number of vehicles being produced by model. These figures would help provide context on the scope and breadth of total vehicle production volume versus the number of vehicles being tested.
- Any training materials being provided to the public, law enforcement, and first responders.
- Updated assessments, provided periodically and when any given assessment becomes outdated, or significant software/hardware upgrades or made, or when online system or over-the-air updates are made to vehicles on the road. Ideally, updated or revised submissions would be methodically linked or documented in conjunction with prior submissions.
- A list of states in which the entity is testing and an appropriate contact for the entity - including multiple methods for contact.

Partnership

In order to foster the optimal environment for collaboration and transparency with regards to innovative technologies, AAMVA encourages entities to complete, submit and update the VSSA. AAMVA further encourages entities that produce and deploy automated systems that are made available to the public as aftermarket products to submit a complete VSSA. As NHTSA and its stakeholder partners continue to describe the process associated with deploying these lifesaving technologies, AAMVA encourages the federal government continue to have an open dialogue with federal, state, and local government officials and the national associations that serve them so

that any efforts to facilitate innovation is approached with a collective and universal understanding of expectations and responsibilities at all levels of government.