



February 28, 2018

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Room W12-140
Washington, DC 20590-0001

RE: Automated Driving Systems [Docket No. FHWA-2017-0049]

The American Association of Motor Vehicle Administrators (AAMVA) welcomes the opportunity to provide comments on the Federal Highway Administration's (FHWA) Request for Information (RFI) regarding Automated Driving Systems. AAMVA is pleased to represent segments of the State Departments of Transportation tasked with the safe testing and deployment of automated driving systems on public roadways.

The RFI cites numerous areas for comment, including the roadway characteristics considered important in influencing the safety, efficiency, and performance of ADS. Numerous reports cite the deteriorating conditions of the roadways absent a comprehensive, solvent and sustainable federal funding mechanism that is appropriate for keeping the operating facilities of the nation's infrastructure in good standing. While speculating on which technologies differing vehicle designs will employ, AAMVA understands that there will be Operational Design Domain (ODD) elements of ADS that require clear and consistent roadway markings for the effective operation of these technologies. This means that lane markings need to be readily visible and detectable for safety features to operate optimally. It also requires an understanding of infrastructure expectations of ADS-equipped vehicles being shared between manufacturing entities and the state DOTs responsible for maintaining that infrastructure. Each jurisdiction faces unique geographic and climate factors that may require additional consideration. Volumes and types of vehicles with dependent ADS technologies may benefit from a direct communication and engagement efforts between the manufacturers developing emerging technologies and individual state DOTs responsible for accommodating those vehicles as state DOTs continue to make infrastructure commitments and plans contingent on facilitating ADS deployment.

Further, while AAMVA would defer to its sister association, the American Association of State Highway Transportation Officials (AASHTO) on matters regarding designation of infrastructure demand, it is clear that ADS must not only accommodate independently operating autonomous vehicles, but also must address connected vehicles that will rely on a significant Vehicle-to-Infrastructure (V2I) capability in addition to traditional infrastructure such as markings, signage etc. The connected aspects of vehicles, autonomous or not, has high safety yields for providing data and information that can significantly impact the ability of a vehicle to detect not only visible dangers to the operating vehicle and its passengers, but will additionally transmit safety data that may not be readily visible to human operators. That data exchange will need to occur not only between vehicle-capable technologies but will also place additional demands on infrastructure

investments tasked with carrying data transmission requirements. With an understanding of the volume and amount of data that may be necessary for preserving safety on the nation's roadways, AAMVA understands there may be a need for consideration of reserved safety channels for the communication of that data. AAMVA encourages U.S. DOT to work with all relevant federal agencies to not only account for appropriate safety spectrum for dedicated safety use, but also to assist in the development of the appropriate security standards for transmission of that data amongst all stakeholders. AAMVA realizes that this will require a great amount of interaction between federal, state, and local entities.

AAMVA defers and encourages US DOT to pay special attention to comments on data needs and information and the current state of infrastructure readiness to comments provided by AASHTO. AAMVA thanks FHWA for the opportunity to comment on these important safety implications associated with the facilitated and safe deployment of automated and connected vehicles, and looks forward to continued engagement with U.S. DOT as we work towards the common goals of national safety and saving lives.