

February 27, 2017

The Honorable Martin A. Sandoval  
Chairman  
Senate Committee on Transportation  
212 Capitol  
Springfield, Illinois 62756

**SUBJECT: OPPOSE –SENATE BILL 1432 – SAFE AUTONOMOUS VEHICLE (SAVE) ACT**

Dear Senator Sandoval:

Global Automakers, [www.globalautomakers.org](http://www.globalautomakers.org), represents the U.S. operations of international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. We work with industry leaders, legislators, regulators, and other stakeholders in the United States. Our goal is to create public policy that improves motor vehicle safety, encourages technological innovation and protects our planet. Our members have made, and continue to make, substantial investments in research and development on automated vehicle technologies. **Our members employ close to 700 people and have invested over \$600 million in Illinois.**

*Our Position*

Global Automakers **opposes SB 1432** for a number of reasons. First, the proposed statute is unnecessarily restrictive, as it limits who can test or operate an AV and the circumstances such vehicles can be tested and operated. For instance, it would prohibit the testing of AVs by entities other than motor vehicle manufacturers, such as tier 1 suppliers, that do not meet the bill's requirements. Similarly, the proposal would expressly prohibit the testing, sale or use of AVs that are not part of a manufacturer-driven SAVE project.

Second, SB 1432 is anti-competitive, since it prescribes a specific business model for the testing and operation of AVs. However, there are many ways in which developers of AV systems and vehicles can safely test and deploy them. State law should not favor one business or ownership model over another, as doing so will stifle innovation and potentially limit access to this technology in the future.

Finally, to the extent that SB 1432 is intended to foster the development, testing and operation of AVs in Illinois, it is unnecessary, as we are not aware of any Illinois statute that prohibits testing or operation. Indeed, rather than promote this life-saving technology, SB 1432 could slow AV technology advancement by erecting an unnecessary bureaucratic regime for companies seeking to operate AVs. Other states have been able to attract businesses to establish AV test programs within their borders without passing measures such as SB 1432.

*Advancing Vehicle Automation Requires the Right Public Policy*

In light of the tremendous societal benefits that vehicle automation can provide, Global Automakers believes that it is critically important that public policy supports and spurs advances in this lifesaving technology, and does not erect unnecessary barriers. This regulatory framework should have two components:

First, it should be flexible and allow manufacturers to develop, test, and market new systems that will provide broad societal benefits. A formal and overly-prescriptive program simply cannot keep up with the pace of innovation. SB 1432 would establish an overly prescriptive regime for testing and operating AVs, complete with specific design and performance criteria AVs must meet in order to be tested in the state.

Second, automated vehicle policy should be national in scope and allow manufacturers to build vehicles that can be tested, sold and operated in all fifty states. A patchwork of state laws establishing inconsistent design and performance criteria for AVs will delay the delivery of real-world safety benefits to the American public and would be unworkable for the industry. It could in theory even mean that people in different states will not have the same access to the latest crash-avoidance technologies.

In September 2016, the National Highway Traffic Safety Administration (NHTSA) issued its Federal Automated Vehicle Policy (the Policy) to serve as a framework to promote a national approach to ensure the continued advancement of AV technology. This Policy includes “Guidance” for the developers of AVs, and is intended to provide a dynamic approach to these issues; issues we believe should be addressed at the federal level to provide greater regulatory certainty and consistency when designing vehicles for a national market. Global Automakers believes that NHTSA’s Federal Automated Vehicle Policy is an important first step toward a consistent national approach for this burgeoning technology. To support the continued deployment of this evolving technology, new approaches are needed as an alternative to the formal rulemaking process. The NHTSA Policy is intended to provide these additional safety assurances, recognizing that technology can advance more rapidly than regulation.

The Model State Policy seeks to provide guidance on how states may help support a uniform nationwide approach to automated vehicle policy. It identifies and defines the important roles that state governments should consider in addressing issues related to vehicle automation, as well as those areas that are not appropriate for state regulation. We strongly believe standards that impact the design and performance of motor vehicles is a federal responsibility while states maintain authority over issues such as driver licensing, vehicle registration and insurance.

*SB 1432 is Unnecessary and Could Erect Barriers to Automated Vehicle Testing and Deployment*

In our view, SB 1432 is unnecessary to promote the safe testing of AVs in Illinois. Other states have recognized that complex rules and requirements could have the unintended consequence of slowing down innovation. States such as Ohio and Virginia have demonstrated how to promote autonomous



vehicle testing without the need to enact new laws or rules. Illinois should follow this example, using the Model State Policy as guidance without codifying its terms.

Sincerely,

A handwritten signature in black ink that reads "Josh Fisher".

Josh Fisher  
Manager  
State Government Affairs