

Motor & Equipment Manufacturers Association

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September 5, 2018

The Honorable Mitch McConnell
Majority Leader
United States Senate
S-230 U.S. Capitol
Washington, D.C. 20510

The Honorable Charles Schumer
Minority Leader
United States Senate
S-221 U.S. Capitol
Washington, D.C. 20510

RE: S. 1885, A Vision for Safer Transportation through Advancement of Revolutionary Technologies Act (AV START Act)

Dear Senators McConnell and Schumer:

On behalf of the Motor and Equipment Manufacturers Association (MEMA), I write you today to reiterate our strong support of the AV START Act (S. 1885) and to urge Senate passage.

Under the leadership of Chairman Thune, Ranking Member Nelson, and Senator Peters, last October the Senate Committee on Commerce, Science, and Transportation *unanimously* approved the AV START Act, which followed unanimous passage in the House of Representatives of their version of the bill, the SELF DRIVE Act (H.R. 3388).

Since passage by the Senate Commerce Committee, there have been numerous bi-partisan efforts to address issues raised by other Senators, and we believe now is the time to pass the bill. During the remaining few weeks of the 115th Congress, passage of this legislation represents a critical opportunity to establish a national framework and begin federal regulation for the safe testing and deployment of automated vehicles.

MEMA represents motor vehicle suppliers that are key developers and manufacturers of the technologies, components, and systems used in passenger cars and heavy trucks contributing more than 77 percent of the value in today's vehicles. MEMA members innovate and produce many of the advanced, transformative technologies that enable safer, smarter, and more efficient vehicles.

Motor vehicle parts suppliers are the largest employer of manufacturing jobs in the U.S., contributing nearly 3 percent of the U.S. gross domestic product. Suppliers directly employ more than 871,000 Americans, up 19 percent since 2012, and generate a total direct and indirect employment impact of 4.26 million jobs, up nearly 18 percent since 2012.¹

The most compelling reason to pass the AV START Act is to increase vehicle safety. Recent U.S. Department of Transportation data shows that in 2016, there were over 37,000 fatalities and over 3.1 million injuries on U.S. roadways² with over 94 percent of traffic collisions the result of human error.³ Automated vehicles will significantly reduce vehicle collisions, fatalities, and injuries. In

¹ "Driving the Future: The Employment and Economic Impact of the Vehicle Supplier Industry in the U.S." MEMA and The Boston Consulting Group, January 2016. https://www.mema.org/sites/default/files/MEMA_ImpactBook.pdf

² U.S. DOT, NHTSA, "2016 Data: Summary of Motor Vehicle Crashes" DOT HS 812 580, August 2018.

³ U.S. DOT, NHTSA, "Critical Reasons for Crashes Investigated in the National Motor Vehicle Crash Causation Survey" DOT HS 812 115, February 2015.





2015, MEMA and the Boston Consulting Group (BCG) released a report exploring the safety benefits of existing advanced driver assistance systems (ADAS) technologies, many of which are crash avoidance and mitigation technologies and serve as building block technologies for higher levels of automation. Our study showed that ADAS technologies provide immediate safety benefits and a pathway to a highly automated vehicle fleet that could virtually eliminate traffic fatalities. The study also found that existing ADAS technologies have the potential to prevent 30 percent of all crashes – a total of 10,000 lives saved annually.⁴

Development and eventual deployment of highly automated vehicle technologies will expand mobility options for persons with disabilities, seniors, and those who require access to more affordable transportation. Also, significant decreases in collisions will mean fewer roadway backups – reducing congestion and vehicle emissions – and diminish overall societal costs.

The AV START Act will provide a clear delineation of federal and state roles with respect to highly automated vehicles — a critical aspect that will result in federal regulation of automated vehicles, and protect against a patchwork of state regulations that could stifle innovation, job growth, and the development of safety technologies that will reduce the number of lives lost on U.S. roadways.

In addition, the legislation will strengthen existing oversight by the National Highway Traffic Safety Administration (NHTSA). Suppliers, vehicle manufacturers, software companies, and other automated vehicle stakeholders will be required to submit to NHTSA the following: safety assessment certifications on test results; cybersecurity plans to identify potential vulnerabilities and responses; and, privacy plans to detail how vehicle information is collected, stored, used, and disclosed to consumers. Finally, a Vehicle Data Access Advisory Committee will be established to develop recommendations to Congress on the ownership, control, and access to vehicle data.

These provisions of S. 1885 initiate necessary regulatory safeguards for the benefit of consumers and the motoring public. The AV START Act represents an historic opportunity for Congress to establish a regulatory framework to advance these groundbreaking technologies while supporting research and investment in the United States.

We urge you to advance S. 1885 to the Senate floor so that members can vote to pass this important legislation. If you have any questions, please contact me at awilson@memma.org or 202-312-9246.

Sincerely,

A handwritten signature in black ink that reads "Ann Wilson". The signature is written in a cursive, flowing style.

Ann Wilson
Senior Vice President

⁴ MEMA and BCG, "[A Roadmap to Safer Driving Through Advanced Driver Assistance Systems](#)," page 2, September 2015.