



August 6, 2020

James C. Owens  
Acting Administrator  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Acting Administrator Owens,

The Alliance for Automotive Innovation (“Auto Innovators”) and the Motor and Equipment Manufacturers Association (“MEMA”) are committed to advancing policies that increase automotive safety on our nation’s roadways.

As you know, Auto Innovators membership includes not only vehicle manufacturers but also Tier 1 suppliers and other value chain partners representing nearly 99 percent of cars and light trucks sold in the U.S. Likewise, MEMA is the nation’s leading trade association representing over 1,000 motor vehicle parts suppliers that manufacture new original equipment (“OE”) components and aftermarket parts for use in passenger and commercial vehicles. Because of our shared commitment to automotive safety, many of our collective supplier and automotive value chain members are heavily focused on developing automated driving systems (“ADS”).

As you know, a critical step in the technology development process is to verify and validate the technology through on-road testing. However, the current regulatory framework presents significant challenges for entities other than traditional manufacturers from testing on public roads.<sup>1</sup> This creates a significant hurdle for qualified, non-OEM ADS developers.

Due to the fact that automated vehicles and related technologies are a key aspect of realizing our future vision, we applaud the ongoing work from the U.S. Department of Transportation and National Highway Traffic Safety Administration (“NHTSA”) to advance automated vehicle (“AV”) testing through the AV Transparency and Engagement for Safe Testing (“TEST”) Initiative. Consistent with the goals of this initiative, we encourage the Agency to publicly release the Notice of Proposed Rulemaking (“NPRM”) to allow an *Expansion of Temporary Exemption Program to Domestic Manufacturers for Research, Demonstrations, and Other Purposes*.<sup>2</sup>

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<sup>1</sup> Section 30112(b)(10) of Title 49, U.S.C.

<sup>2</sup> RIN: 2127-AM14

The Agency's efforts to launch the AV TEST Initiative would be complemented by both the issuance of the NPRM to expand the eligible entities who can utilize the temporary exemptions for AV development and by implementation of a pilot program along the lines put forward by NHTSA in their 2018 proposed rulemaking.<sup>3</sup> To be clear, we do not support an open-ended allowance for *any* entity to test a prototype vehicle on public roads. Instead, we support efforts to create additional opportunities for *qualified* ADS developers to safely test their vehicles on public roads subject to NHTSA oversight.

We look forward to reviewing and providing comments on NHTSA's proposed *Expansion of Temporary Exemption Program to Domestic Manufacturers for Research, Demonstrations, and Other Purposes* NPRM when it is released. We appreciate the Agency's work to advance AV technologies and stand ready to help achieve our shared goal of increasing roadway safety.

Sincerely,



David Schwietert  
Chief Policy Officer  
Alliance for Automotive Innovation



Ann Wilson  
Senior Vice President, Government Affairs  
MEMA

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<sup>3</sup> NHTSA Advance Notice of Proposed Rulemaking (ANPRM): *Pilot Program for Collaborative Research on Motor Vehicles with High or Full Driving Automation*, NHTSA Docket No. 2018-0092, 83 Fed. Reg. 50872 (October 10, 2018)