

Motor & Equipment Manufacturers Association

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February 11, 2020

The Honorable Janice Schakowsky
Chairman
Subcommittee on Consumer
Protection and Commerce
Committee on Energy & Commerce
U.S. House of Representatives
Washington, DC 20515

The Honorable Cathy McMorris Rodgers
Ranking Member
Subcommittee on Consumer
Protection and Commerce
Committee on Energy & Commerce
U.S. House of Representatives
Washington, DC 20515

RE: Letter for the Record “Autonomous Vehicles: Promises and Challenges of Evolving Automotive Technologies”

Dear Chairwoman Schakowsky and Ranking Member McMorris Rodgers:

The Motor & Equipment Manufacturers Association (MEMA) represents more than 1,000 companies that manufacture and remanufacture motor vehicle parts, components, and systems for use in the light- and heavy-duty vehicle original equipment and aftermarket industries. Our members provide more than 871,000 direct jobs, making the motor vehicle parts industry the largest sector of manufacturing jobs nationwide.¹ Our members lead the way in developing advanced, transformative technologies that enable safer, smarter, and more efficient vehicles, all within a rapidly growing global marketplace with increased regulatory and consumer demands. On behalf of this industry, MEMA appreciates the opportunity to submit comments for the hearing record on “Autonomous Vehicles: Promises and Challenges of Evolving Automotive Technologies.”

Thank you for holding today’s hearing on the issues facing new automated technologies. The Subcommittee’s continued focus on the development and deployment of automated vehicle (AV) technologies is of the utmost importance to the supplier industry. As key developers of advanced technologies, vehicle suppliers have made significant investments in research and development, design, and validation testing to produce a wide range of safety innovations for their vehicle manufacturer customers, a.k.a. original equipment manufacturers (OEMs). Working collaboratively with OEMs, suppliers are critical in the ongoing creation, refinement, and implementation of these technologies, which are the building blocks necessary to allow automated driving system-equipped (ADS) vehicles to reach their full potential.

Passage of legislation on ADS-equipped vehicles will provide the necessary certainty for vehicle suppliers to continue to invest in innovation in the United States. This investment will help the United States remain a global leader in technology development and deployment. The federal government has an important role to offer a framework of laws, policies, and regulations that foster this critical investment.

MEMA strongly supports narrow, targeted AV legislation focused on creating a path forward for the development and deployment of ADS-equipped AVs and technologies. MEMA urges Congress to pass legislation this year that addresses industry priorities. These priorities include:

- **Clarification of the distinction between federal and state roles in regulating AVs.**
A patchwork of state requirements may impede testing, deployment, and operating ADS-



equipped vehicles. The federal government must have primary oversight over vehicle safety, with state and local governments regulating registration and licensing requirements.

- **Affirmation of suppliers' ability to test and evaluate automated driving systems on public roads.** Suppliers are critical to the overall development and refinement of automated vehicle technology. If suppliers are not able to carry out this work in an independent manner, then it will impede and delay the evolution of the critical systems, artificial intelligence, human machine interface, and other advancements that are needed to bring the vision of automated vehicles to fruition.

Suppliers are committed to improving vehicle safety and are leading the way in developing the technologies necessary to reduce fatalities and injuries. Passage of bipartisan AV legislation is a critical part of necessary policies to deploy ADS-equipped vehicle in the United States because it will provide certainty for the vehicle industry. Legislation should recognize that these innovative technologies are rapidly developing, and traditional federal standards development simply cannot keep pace. Federal policies, foundational regulations, and other voluntary mechanisms are available and should be utilized in order to support innovation and encourage deployment of ADS-equipped AVs. Implementing a variety of strategies are necessary for our country to remain a global leader in AV technologies and to protect companies' R&D and product development investments in the United States.

MEMA is pleased to have the opportunity to provide you with our priorities as the Subcommittee and Committee consider the challenges and opportunities facing the development and deployment of automated technologies. For more information, please contact Catherine Boland, vice president, legislative affairs at cboland@mema.org or 202-312-9241.

Sincerely,



Ann Wilson
Senior Vice President
Government Affairs

ⁱ MEMA represents its members through four divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); Motor & Equipment Remanufacturers Association (MERA); and, Original Equipment Suppliers Association (OESA). Also view MEMA's [study](#) on the economic and employment impact of U.S. vehicle suppliers.