



July 16, 2020

Representative Tim Hennessey  
Chair, House Transportation Committee  
313 Main Capitol Building  
PO Box 202026  
Harrisburg, PA 17120-2026

Representative Mike Carroll  
Democratic Chair, House Transportation Committee  
300 Main Capitol Building  
PO Box 202118  
Harrisburg, PA 17120-2118

Dear Representative Hennessey, Representative Carroll, and Members of the House Transportation Committee:

The Self-Driving Coalition for Safer Streets, a group of leading autonomous vehicle (“AVs”) companies that includes Argo, Aurora, Ford, Lyft, Nuro, Uber, Volvo, and Waymo, seeks to promote the safe and rapid deployment of AVs so that the public can benefit from this life-saving technology. We appreciate Pennsylvania’s interest in autonomous technology and we write to provide feedback regarding SB 1199 in anticipation of the Transportation Committee’s hearing on Tuesday, July 21st. While SB 1199 would regulate personal delivery devices, rather than AVs, we are concerned that SB 1199 would unnecessarily involve personal delivery device operators in the regulation of AVs and includes concepts that, if applied to AVs, could impede the potential deployment of AVs in Pennsylvania. In addition to the comments in this letter, we would welcome the opportunity to meet with you to discuss how the legislature might address AVs in future legislation.

The Self-Driving Coalition for Safer Streets agrees with structuring the definition of “personal delivery devices” to not include AVs used on public roads. Specifically, the proposed definition of personal delivery devices effectively distinguishes AVs intended to transport goods on the roadways from personal delivery devices. In particular, we support retaining the weight element of this definition as this draws a clear line between personal delivery devices and road vehicles.

However, the Coalition does not support SB 1199 providing a seat for a personal delivery device operator on the Pennsylvania Highly Automated Vehicle Advisory Committee. As



personal delivery devices operate primarily off of the roadway, these devices present distinct issues from Highly Automated Vehicles. The work of the Advisory Committee should remain focused on Highly Automated Vehicles that operate on the roadway, at higher speeds, and without a manual human operator. Personal delivery devices operators are unlikely to provide insights that would be applicable to road-worthy and road-legal AVs and may detract focus from regulating the safe testing and, ultimately, deployment of Highly Automated Vehicles. Therefore, we recommend not including a personal delivery device operator in the Committee's membership or jurisdiction.

In addition, as we look ahead to future legislation, there are certain aspects of SB 1199 that concern the Coalition to the extent such concepts could be applied to AVs in future legislation. For example, we do not support language providing the Pennsylvania Department of Transportation ("PennDOT") veto authority over a company's operation of AVs, as is contemplated in SB 1199 for personal delivery devices. In the absence of serious or systemic safety issues, we believe companies should be able to grow their businesses—making available life-saving and mobility-enhancing technology while also augmenting the economy. Further, in the case of motor vehicles, PennDOT has sufficient existing authority to address any safety issues that arise and should rely on those authorities rather than pre-approval of an annual plan for a specific vehicle type.

In addition, SB 1199 would enable any local authorities to regulate personal delivery devices. However, with respect to future AV legislation, we recommend including clear language that preempts local authority to ensure a consistent statewide framework that provides operational and regulatory clarity. Absent such preemption, the uncertainty created by a possible patchwork of regulation may hamper companies' willingness or ability to deploy AVs in Pennsylvania.

We also note that while SB 1199 would prescribe requirements regarding the design of personal delivery devices, such as by requiring a personal delivery device to be equipped with certain lamps, we recommend that a bill designed to address the deployment of AVs not mirror this approach. Instead, we suggest that such a bill rely on the requirements for motor vehicle equipment. While the requirements for motor vehicle equipment may in some cases need to be updated for novel vehicle designs or the operation of vehicles with no driver, we would welcome the opportunity to discuss with you how Pennsylvania might address such considerations in the future.

We believe that AVs and autonomous technologies have great potential to improve safety and mobility. As the Commonwealth of Pennsylvania continues to explore regulating



autonomous technologies, the Coalition looks forward to serving as a resource concerning both technical and policy questions and working with you to make self-driving cars a reality.

We appreciate your interest in this area and hope to partner with lawmakers to discuss language addressing AVs moving forward.

Sincerely,

/s/

Ariel S. Wolf

Counsel  
Self-Driving Coalition for Safer Streets

CC: Members of the House Transportation Committee