



**TESTIMONY BY
THE PENNSYLVANIA STATE ASSOCIATION OF
TOWNSHIP SUPERVISORS**

**BEFORE THE
HOUSE TRANSPORTATION COMMITTEE**

ON

SENATE BILL 1199 (*PN 1823*)

PRESENTED BY

**MELISSA J. MORGAN
LEGISLATIVE & POLICY ANALYST**

**July 21, 2020
HARRISBURG, PA**

Chairman Hennessey and members of the House Transportation Committee:

My name is Melissa Morgan and I am the legislative and policy analyst for the Pennsylvania State Association of Township Supervisors. Thank you for the opportunity to provide comments on behalf of the 1,454 townships in Pennsylvania represented by the Association.

The Association is a non-partisan, non-profit member service organization. Member townships represents 5.6 million Pennsylvanians — more residents than any other type of Pennsylvania municipal government and cover 95 percent of the commonwealth's land mass. Thank you for giving us the opportunity to comment on an issue that could impact many of our members.

Over the last few years, e-commerce has exploded, which has increased the demand on delivery services. And the current pandemic has accelerated this already growing trend. We understand the need for improved efficiencies and new technologies to allow delivery companies to meet this growing demand and understand that a number of companies have developed autonomous devices, essentially delivery robots created to help fulfill this need.

These are new devices and there will be areas where it may not be safe to operate these devices due to sight distances and traffic issues. We appreciate that changes made in the Senate to an earlier version of SB 1199 (PN 1823) to recognize the importance of local control in evaluating safety issues and, in those specific locations where the operation of these devices would constitute a hazard in pedestrian areas, on the local road, or both, to prohibit their operation. Municipal officials would also have the option to authorize the use of these devices on roads with speed limits over 25 miles per hour up to 35 miles per hour if deemed safe and appropriate. We believe it is critical that municipal officials be empowered to exercise local control for public safety purposes.

As the technology for automated vehicles and delivery devices is developed and is deployed, we believe that there is a need for more local official representation on the state's Highly Automated Vehicle Advisory Committee. Current law provides for only one municipal representative, but we believe it is important to have the perspective of different types of communities as the challenges posed in urban, suburban, and rural communities will be different. As such, we request that townships have a seat at the table, particularly as we have come to understand that improvements may be needed to local roads to facilitate automated vehicles.

We understand that others may request that these devices be permitted initially as a pilot program. As this is new technology that will be deployed in Pennsylvania, we have no objection to an initial pilot program under the Department of Transportation's oversight. If implemented, this would allow any issues to be worked out prior to full deployment. We also point out that under the current bill, it appears that any business entity that submits an acceptable plan to the Department could operate these devices, even during the initial timeframe.

Under the bill, a device would be regulated as a pedestrian and not as a motor vehicle. We question whether this is appropriate, as "pedestrian" is defined in Title 75 as "a natural person afoot." We understand due to the limitation of these devices and their operation in

pedestrian areas that they should probably not be regulated as a motor vehicle, however, would it be more appropriate to have a separate category for these autonomous delivery devices?

Finally, while these devices would need to have clearly identifiable markers with the name, contact information, and unique identification of the owner of the personal delivery device, we question whether these markers should also have a unique identifier for the particular device itself.

As these devices are implemented to help promote commerce, we appreciate the critical inclusion of local control to keep these devices from becoming a hazard in specific identified areas. And we are happy to work with the sponsor and the committee on improvements to the legislation.

Thank you for the opportunity to participate today. I am happy to take any questions that you have.