

July 25, 2018

United States Senate:



The leadership of the [Community Transportation Association of America](#) (CTAA) opposes any effort to attach the pending AV START Act (S. 1885) to the Federal Aviation Administration (FAA) Reauthorization Act (S. 1405), which is expected to be considered by the Senate within the next several weeks. Giving the AV START Act a “ride” on the FAA bill would therefore deny the Senate, and thereby the American people, the opportunity to fully consider and debate the important safety, regulatory, and preemption issues that are at stake.

## Transit For All

CTAA members, affiliates, board and state/tribal delegates are dedicated to ensuring that all Americans, regardless of age, ability, geography or income, have access to safe, affordable and reliable transportation. CTAA members all across the United States are in the business of moving people - efficiently and cost-effectively – by transit, paratransit, volunteer transportation, and specialized transportation.



### CTAA Supports AV Development, Testing, and Pilots

CTAA supports developing, testing, and piloting of autonomous vehicle (AV) technology and programs that will offer accessibility, safety, convenience, and affordability wherever people live and whatever their financial positions, and their physical, sensory or mental conditions.

CTAA has become a leader in providing resources and analysis of AVs and their impact on mobility options. We are educating transportation professionals across the United States, providing AV technical assistance, presenting at conferences, and engaging in discussions with companies developing different aspects of AVs and associated software. We monitor AV issues daily to stay abreast of technological, legislative, and regulatory updates. We have connected with other national organizations with an interest in AV development. Our work increasingly integrates emerging business models, public-private partnerships, and shared-use experimentation and advances.

### Safety

Currently, bus transit operations are the safest mode of transportation in the United States. In fact, [bus transit systems overall, and rural transit in particular, are the safest modes of surface transportation in the United States](#) and have, next to air travel, the best safety record of all transportation modes. CTAA wishes to continue that exemplary record and to ensure that our other modes of transportation catch up to the safety rate of bus transit.

By ignoring these extremely safe modes of transportation on which millions of Americans rely – specifically public transit, paratransit, tribal transit and transportation services, volunteer transportation, and specialized transportation – the AV START Act would perpetuate the current auto-oriented transportation system that results in the deaths of over 35,000 Americans each year, plus untold numbers of major and minor injuries. The Uber and Tesla crashes show that the combination of untrained drivers operating vehicles with partial automation technology

poses great risks for everyone who uses our roadways, and not only for those who choose to take advantage of new technology. CTAA requests that the Senate encourage safety through increased availability of the safest modes of transportation and the safest technology. The Senate should therefore support funding for transit pilots using AVs. Thus far, these pilots and corporate testing with highly trained drivers have proven extremely safe.

CTAA therefore endorses the position that fully automated and partially automated vehicles be distinguished and separately considered in any AV legislation.

CTAA agrees with the [July 16 letter sent to Senators by a coalition of 65 consumer advocacy and street safety organizations](#) that:

[T]he AV START Act, in its current form, would shockingly allow potentially millions of vehicles on the market to be exempt from meeting existing safety standards. The failures of unproven driving automation systems already have led, tragically, to crashes which have resulted in at least three deaths. The National Transportation Safety Board (NTSB) has several open investigations which will produce findings likely to have a direct bearing on the AV START Act. The bill should not be advanced, especially as a rider on the FAA bill, until those investigations are complete and critically-needed changes are made to ensure safety.

CTAA supports the following safety and data recommendations included in that letter, in particular:

- Require minimum performance standards such as a “vision test” for driverless technologies, cybersecurity and electronics system protections, and distracted driving requirements when a human needs to take back control of a vehicle from a computer;
- Provide for adequate data collection and consumer information;
- Compel all AVs to capture detailed crash data in a format that will aid investigators such as the NTSB and the National Highway Traffic Safety Administration (NHTSA);
- Ensure access and safety for members of all disability communities which have differing needs;
- Subject Level 2 (partially-automated) vehicles to all safety critical provisions;
- Prohibit manufacturers from unilaterally “turning off” vehicle systems such as the steering wheel and gas pedal which is not allowed under current law;
- Maintain the right of states and localities to protect their citizens by regulating the AV system in absence of federal regulations; and,
- Provide NHTSA with sufficient resources and authorities.

In addition to safety, CTAA asks that the Senate consider the broad effects that AVs will have on employment, on our transportation system, and on individuals.

### Driver Jobs

CTAA is quite concerned about the implications of AVs on driver jobs. The AV START Act does not address these issues. CTAA recommends that the Senate support research and technical assistance for the retraining of commercial drivers as well as those who professionally drive

noncommercial vehicles. Our professional drivers transport millions of Americans each day to school, employment, medical care, and all of the many activities that make for a full life. Some of these drivers will be able to fill other positions in freight, intercity, bus, taxi, shared-use, and transit operations, but many other drivers will be compelled to find work elsewhere, needing education and training to do so. Congress has an obligation to consider and to debate how AVs will affect the many Americans who currently earn their livings by driving.

The US Department of Transportation should be empowered to research successful practices for retraining large numbers of workers and enabling those workers to find positions with equivalent income and benefit packages. That research should also include possibilities for innovative retraining and for determining what other supports drivers will need as they experience a substantial change in their careers.

#### Rural Areas, Transit, Volunteer Transportation and Specialized Transportation

CTAA urges the Senate to consider those places and people that are currently left unmentioned in planning for AVs, specifically rural areas and individuals who rely on transit, volunteer transportation, and specialized transportation. By not addressing these issues, the Senate will effectively perpetuate current inequalities based merely on low rural population density, medical and other conditions that result in disability, and changes that affect most of us as we age.

CTAA requests that the Senate support research, technical assistance, and pilot programs to ensure that all Americans wherever we live, and whatever our physical, sensory, cognitive or other conditions, will benefit when our transportation system is transformed with AV transportation.

#### Conclusion

CTAA therefore agrees with the [July 16 letter](#) mentioned above that:

It would be egregious to push the AV START Act through by tacking it onto a must-pass bill. Doing so would circumvent the regular legislative process and cut it off from full debate, discussion, transparent consideration, and the offering of amendments.

CTAA enthusiastically supports the development, testing, and piloting of AV technology, and we encourage the Senate to fully debate and to take its time to consider AVs and the great impact this transportation revolution will have on our transportation system, our safety, and on our economic opportunities.

Respectfully,



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Executive Director