



March 29, 2022

Hon. Richard Proehl
Chair, House Committee on Transportation
300 SW 10th Ave
Topeka, KS 66612

RE: Senate Bill 546 – Automated Vehicle Technology

Chair Proehl,

On behalf of the Alliance for Automotive Innovation (Auto Innovators), I thank you for the opportunity to provide comments on SB 546. This legislation aims to establish an automated vehicle (AV) framework in Kansas that fosters innovation and welcomes these life-saving technologies for use in all communities. We believe that SB 546, which has come a long way from its original form, still requires further refinement to provide the consistency and clarification needed for AV deployment.

Supporting more than 10 million auto-related jobs, the Auto Innovators membership includes not only vehicle manufacturers representing nearly 99 percent of all cars and light trucks sold in the U.S., but also Tier One suppliers, value chain partners, and technology companies. Because of our commitment to cleaner, safer, and smarter policies most of our manufacturing and automotive value chain members are leading the way on developing automated driving systems (ADS). Auto Innovators advocates strongly for a federal law governing automated vehicles, in lieu of a state patchwork of laws, but if a state passes an AV policy it is important to provide continuity from one state to another. This will encourage competition domestically, which will help the U.S. keep up with other countries that are positioning themselves as global leaders on AVs. Auto Innovators has worked with several stakeholders over the past 2 months to help craft a bill that provides this consistency.

According to data from NHTSA, there were 38,680 lives lost on United States roads in 2020 despite fewer people on the road. While cumulative numbers are not yet available, more than 20,000 lives had been lost in the first six months of 2021. ADS-equipped vehicles have the potential to drastically reduce vehicle crashes and save thousands of lives. And for millions of Americans who cannot drive, or do not, including the elderly and many people with disabilities, this technology represents the potential for unprecedented freedom and independence. For those unable to afford the cost of vehicle ownership or people who live in communities where owning a vehicle is not necessary, ridesharing applications have shown to expand access to new transportation and mobility options. Also, COVID-19 has shown the potential for contactless and driverless delivery applications. Consequently, there is a need to clear the path for higher levels of automated vehicles. SB 546, as written, would rule out the possibility for some these automated driving possibilities by stifling and limiting innovation. For example, there is a separate requirement for a safety driver to be present for twenty-four months in all AV transportation services. This is not consistent with other state AV laws and there is already a separate one-year safety requirement in the same section of the bill.

Safety is the top priority for automakers and a primary goal for the development of ADS-equipped vehicles. Automakers take this responsibility very seriously and have invested billions as well as years of development and research in technologies meant to reduce the frequency and severity of vehicle crashes. For instance, crash avoidance technologies such as automated emergency braking, lane-keeping assistance, blind spot monitoring, and forward collision warning are offered on many of our

members' products today. ADS-equipped vehicles, known as SAE Level 3-5 vehicles, automate portions or all of the complete dynamic driving task (depending on level) and, have an even greater potential to reduce the number of traffic crashes on our nation's roadways. As drafted, SB 546 would blur the lines of whether the full spectrum of ADS may operate in Kansas. Section 4(c)1 incorporates changes that we understand is a technical error from the drafting process that impacts requests or prompts from an ADS. These technologies are all intended to help address the number of crashes involving human error on our roadways, which the National Highway Traffic Safety Administration (NHTSA) estimates contributes to nearly all vehicle crashes on US highways.

Lastly, we appreciate the opportunity to express our views and concerns to SB 546 in its current form. We understand that amendments have been drafted to restore the bill to its intended form and purpose. We respectfully ask that you adopt these changes, which would allow Auto Innovators to restore our full support of SB 546. As a major contributor to the Kansas economic engine, the Alliance for Automotive Innovation's members hope to continue to serve as a resource for the committee and sponsor as the state welcomes new innovative technologies. Thank for your consideration.

Sincerely,



Leighton Yates
Director, State Affairs

CC: House Committee on Transportation