

March 27, 2017

The Honorable Lee Beyer
Chairman
Senate Committee on Business and Transportation
900 Court St. NE
Salem, Oregon 97301

**SUBJECT: OPPOSE – SENATE BILL 981 - ESTABLISHES PROCEDURE FOR
AUTOMATED MOTOR VEHICLE MANUFACTURER TO SUBMIT CERTIFICATE OF
COMPLIANCE TO DEPARTMENT OF TRANSPORTATION**

Dear Senator Beyer:

Global Automakers, www.globalautomakers.org, represents the U.S. operations of international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. We work with industry leaders, legislators, regulators, and other stakeholders in the United States in order to create public policy that improves motor vehicle safety, encourages technological innovation and protects our planet. **In 2015, our members manufactured 54% of all new motor vehicles and 72% of green technology vehicles sold in Oregon.**

Our Position

Global Automakers **opposes SB 981**. First, **the legislation is unnecessarily restrictive**, as it includes specific design requirements for such vehicles and restricts the circumstances under which these vehicles can be tested and operated. Motor vehicle design and performance requirements are the sole domain of the federal government. Individual state design and performance requirements will create a patchwork of laws that will inhibit the advancement of this technology.

The legislation is also unnecessary to foster the development, testing and operation of automated vehicles in Oregon. We are unaware of any Oregon statute that prohibits testing or operation. This bill could slow automated vehicle technology advancement by erecting an unnecessary bureaucratic regime for companies seeking to operate in the state.

Advancing Vehicle Automation Requires the Right Public Policy

Vehicle automation promises to deliver tremendous societal and lifesaving benefits. Therefore, public policy should foster and support this technology, and not hinder it. Any regulatory framework concerning automated vehicles should have two components: it should be (1) **flexible**, and (2) **national in scope**.

The legislation under consideration is *inflexible* and will never keep up with the pace of innovation. In addition, this legislation contributes to an *inconsistent “patchwork”* of state laws establishing conflicting design and performance criteria.

How Oregon Can Play a Role in Advancing Automated Vehicle Technology

In our view, SB 981 is unnecessary to promote the safe testing of automated vehicles in Oregon. Other states have refrained from enacting such laws, recognizing that complex rules and requirements could have the unintended consequences. Ohio, for example, has demonstrated how to promote autonomous vehicle testing without the need to enact new laws or rules. The city of Columbus was selected as the first “Smart City Challenge” grant recipient, becoming the first fully integrated connected transportation network in the nation. In addition, Governor Kasich has designated a stretch of US-33 as an innovation corridor and committed state resources to accelerate testing. Finally, Ohio established the “Smart Belt Coalition,” working across state borders to support research and development of automated and connected vehicle technology.

Oregon can play a similar leadership role without enacting legislation by **(a) identifying any specific impediments or barriers to testing or operation that exist currently in statute, (b) convening key stakeholders and innovators to leverage resources and share best practices, and (c) collaborating with neighboring states to support regional efforts to advance automated vehicle technology while at the same time ensuring a national framework for automated vehicle policy.**

Sincerely,



Josh Fisher
Manager
State Government Affairs