



City of Portland

March 29, 2017

Senator Lee Beyer, Chair  
Senate Committee on Business and Transportation  
900 Court Street NE, HR B  
Salem, Oregon 97301

Dear Chair Beyer and Members of the Committee:

The City of Portland opposes SB 981 as introduced because the bill preempts state and local authority to ensure safe use of our rights of way, and prematurely authorizes widespread deployment of autonomous vehicles (AVs). Instead, we encourage you to form a workgroup using the five principles below to develop legislative recommendations.

Portland is one of the world's leading cities partnering with the private and university sectors to develop best practices for testing and piloting autonomous, electric, and shared vehicles. AVs have the potential to benefit our communities by reducing crashes, improving first and last mile connections for transit users, and reducing the high cost of owning a private vehicle. AVs also have the potential to significantly increase traffic congestion, vehicle miles travelled, and climate pollution. The protections and rules of the road adopted by state and local governments will substantially determine how much benefit and how much burden we experience.

The City of Portland requests the formation of a workgroup that considers the following five principles to evaluate and shape state AV policy and legislation:

**1. Maintain Authority; Build Partnerships**

Maintain state and local authority to manage the testing and operation of autonomous vehicles in our rights-of-way. We strongly oppose preemption and self-certification as a replacement for registration and reporting. Both would increase risk, decrease transparency, and undermine management by those responsible for managing our rights-of-way. Instead, support and reward partnerships between the public and private sectors and between local, regional, and state transportation agencies.

**2. Phasing**

Phase in authorization to operate autonomous vehicles, starting with allowing testing and piloting a limited number of registered autonomous vehicles before widespread deployment.

### 3. Advance Outcomes

Legislation should clearly prioritize AVs that advance adopted state energy, climate, equity, and congestion policies. Fleet autonomous vehicles that are electric and shared by multiple passengers (captured by the acronym FAVES) is one priority likely to help advance state and local goals. State and local policy should also ensure equitable access to the benefits of AVs.

### 4. Register and Inform

Ensure that AV testing and deployment is transparent while protecting individual privacy and proprietary technologies to both overcome reported public skepticism of AVs and to provide sufficient information to inform right-of-way management.

- Semi-autonomous and fully autonomous vehicles should be pre-registered with state and local agencies.
- Test and pilot boundaries and conditions should be pre-registered and approved by the agencies managing the rights-of-way. The public has a right to know when, where, and how AVs will be tested and piloted.
- AVs should have a visible external display on the vehicle.
- AVs operating in public rights of way should provide state and local governments sufficient vehicle operating information to evaluate safety, congestion, climate, and equity implications.

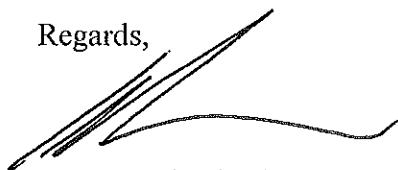
### 5. Financial Responsibility: User Pays

Investing in connected and autonomous (CAV) infrastructure and software could be very costly to state and local governments. So could evaluating the benefits and impacts of tests and pilots. State and local governments should be able to recover initial and ongoing infrastructure, service, and administrative costs associated with CAVs.

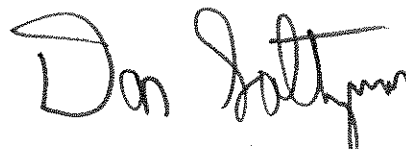
Introduction of AVs also provides an opportunity to reduce congestion. CAV legislation should encourage evaluating congestion pricing to improve reliability and reduce delay. Pricing factors should include location and time of day, Vehicle Miles Travelled (VMT), occupancy, and fuel source (e.g. electric vs. fossil-fuel). Doing so creates incentives to move more people in fewer vehicles, reducing congestion and climate pollution while saving people travel costs.

Developing an appropriate AV legislative framework will take time and collaboration. The City of Portland encourages the formation of a workgroup wherein the Legislature and stakeholders can produce a framework that advances our shared economic, environmental, safety and equity goals.

Regards,



Mayor Ted Wheeler



Transportation Commissioner Dan Saltzman