



**TECHNET**  
THE VOICE OF THE  
INNOVATION ECONOMY

April 29, 2019

Senator Lee Beyer, Co-chair  
Representative Caddy McKeown, Co-chair  
Joint Committee on Transportation  
Oregon State Legislature

**Re: HB 2770 – Highly Automated Vehicle Testing**

Chairs Beyer and McKeown and Members of the Joint Committee on Transportation:

*TechNet is the national network of over eighty technology companies that promotes the growth of the innovation economy through bipartisan advocacy at the federal and state level in all fifty states. TechNet's diverse membership includes dynamic American businesses ranging from small startups to the most prominent global companies and represents more than three million employees in the fields of information technology, e-commerce, clean energy, gig and sharing economy, venture capital, and finance.*

TechNet and its members support policies that encourage the safe deployment of fully autonomous vehicles (AVs) on public roads in the United States. While TechNet greatly appreciates the thoughtful work of Rep. McLain on this important topic, we are concerned that well-intentioned policy frameworks envisioned in HB 2770 will unintentionally stifle innovation and impede the safety benefits of this technology. We encourage the Committee to avoid recommending a policy that will create or maintain barriers to the deployment of this technology and the benefits that come with it.

The development of autonomous vehicles will enable tremendous societal benefits by improving vehicle safety and access to transportation for disabled people, the elderly, and others who cannot currently drive themselves. Fully autonomous vehicles have the potential to improve safety by reducing the severity and frequency of automobile accidents and to mitigate other inefficiencies of current motor vehicle use, such as congestion.

Our first major concern with the legislation as drafted is that it does not allow for commercial deployment of fully autonomous vehicles. Simply put, without a pathway to deployment, there is no incentive for companies to test in the state. Therefore, the likelihood that any meaningful testing occurs in Oregon in the next few years would be very low. To limit Oregon to testing permits significantly sets the state back behind California and other states. Twelve states have already expressly authorized driverless commercial deployment through legislation, and two more have done so through Executive Orders.

Our second major concern with the legislation is the bill requires a vehicle either at all times has an on-board test operator or has an off-board operator who is capable of remote driving. Many AV companies are pursuing approaches that do not rely on a human driver of any kind, whether onboard or off-board. The inclusion of this requirement would also discourage companies from investing in Oregon as their technology is truly driverless and would not conform to the requirement of HB 2770. Policymakers should not predetermine how the technology will develop or legislate technology by specifying the role of a human in its development.

Additionally, National Highway Traffic Safety Administration (NHTSA) is responsible automotive vehicle safety by promulgating Federal Motor Vehicle Safety Standards, and has already developed standards for vehicle data recording. TechNet encourages the Committee to remove requirements for specific vehicle design and deferring to NHTSA to establish standards that will be consistent nationwide. TechNet also has concerns regarding with the insurance limit and the cap on number of AV vehicles on public roads. For these above stated reasons, TechNet cannot support HB 2770 as currently drafted.

Thank you in advance for your consideration on this matter. TechNet looks forward to continuing to engage on this issue. Please do not hesitate to reach out if I may be able to provide you with additional information.

Sincerely,



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