



July 1, 2020

The Honorable Nancy Pelosi
Speaker
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Kevin McCarthy
Republican Leader
U.S. House of Representatives
Washington, D.C. 20515

Dear Speaker Pelosi and Leader McCarthy:

On behalf of the Alliance for Automotive Innovation (Auto Innovators) I write to share the auto industry's perspective as the U.S. House of Representatives considers H.R. 2, the *Moving Forward Act*. As the lead trade association for the auto industry, Auto Innovators is committed to harnessing American ingenuity in support of the next generation of safer, cleaner and smarter vehicles. While Auto Innovators supports efforts in Congress to craft a multi-year reauthorization of surface transportation programs, we have several concerns with H.R. 2 in its current form. Although there are positive aspects of the legislation – such as the approach to spur vehicle electrification and related infrastructure – other provisions are structured in such a manner that they undermine our shared objective when it comes to vehicle safety and related technologies.

On the one hand, we appreciate the bill's forward-looking commitment to vehicle electrification. The infrastructure provisions combined with expanded consumer incentives for both plug-in and hydrogen fuel cell electric vehicles can help promote the adoption and use of these vehicles which accounted for roughly two percent of sales nationwide last year. These provisions complement the significant long-term investments being made by our members in these technologies.

On the other hand, certain provisions undermine the development and delivery of the next generation of motor vehicle technologies, particularly safety technologies. Auto Innovators shares the goal of automotive safety improvements. Our concern is with the approach taken in H.R. 2 to achieve the goal.

Rather than advancing U.S. leadership and innovation in defining the future of advanced automotive safety technologies – including automated vehicles – that can significantly reduce the number of fatalities on our roadways each year, the *Moving Forward Act* seeks to prescribe specific technologies, not a path to the future. This approach risks delaying the advancement and introduction of important safety technologies to American consumers and undermines U.S. competitiveness in the global market.

For example, despite intense global competition to define the future of automated vehicle technologies, the opportunity for the U.S. to continue to shape the future of these transformative safety technologies is missed under H.R. 2. At this critical juncture, the *Moving Forward Act* fails to implement a robust federal framework for the safe testing and deployment of automated vehicles and instead creates roadblocks to continued innovation. As a result, the bill jeopardizes continued progress on the development, testing, and deployment of these transformative technologies in the U.S.

In many other instances, Auto Innovators shares the ultimate safety goals put forward by the Committees of jurisdiction but believes a different approach could more effectively and efficiently achieve these results. For example, H.R. 2:

- Mandates the deployment of advanced driver alcohol detection technology, while at the same time, eliminates the authorization for the Driver Alcohol Detection System for Safety (DADSS) Research Program at the end of Fiscal Year 2021. While DADSS, which is currently being developed through a joint public-private partnership, has great potential to reduce drunk driving and save lives, additional research and testing must be completed prior to its deployment in vehicles for consumer purchase. As a result, H.R. 2's proposed mandate would not prevent drunk driving – it would only delay, if not eliminate, the development and deployment of the only known technology capable of determining a driver's blood alcohol content (BAC) and, if intoxicated, not allow the vehicle to be driven. Likewise, the other distracted driver technologies, such as driver monitoring systems, allowed under the mandate would neither detect nor test for a driver's BAC and would allow the vehicle to be driven prior to determining impairment. Eliminating the authorization for the DADSS program in favor of mandating technologies developed for other purposes puts at risk years of cutting-edge research and significantly delays the pathway to potential adoption of the same lifesaving technology that the bill seeks to mandate.
- Mandates a specific technological approach to reduce the tragic loss of life due to pediatric heatstroke from children left unattended in vehicles. Auto Innovators members have already publicly committed to deploying related technologies in to alert the driver of the vehicle (parents, siblings or caregivers) to check their rear seating positions for the potential of an occupant before exiting the vehicle. This voluntary approach will ensure that such lifesaving technologies will be available to consumers considerably faster than a mandated rulemaking.¹
- Mandates specific Advanced Driver Assistance Technologies (ADAS), diverting focus and momentum from the on-going development of these technologies and systems, chilling competitive innovation, causing uncertainty, and ultimately slowing down deployment. Auto Innovators members are deeply committed to greater ADAS adoption and are investing heavily in developing these critical technologies, which continue to be subject to safety oversight by the U.S. DOT.
- Approaches updates to the New Car Assessment Program (NCAP) in an overly prescriptive and unrealistic manner. Auto Innovators members strongly support common sense, data driven updates to modernize NCAP by including proven crash avoidance technologies, emphasizing increased customer awareness, harmonization with international standards, avoiding customer confusion, and providing greater overall program transparency.

While Auto Innovators would prefer a different approach to these, and other, provisions in H.R. 2, our members share the desire to improve vehicle safety. We agree on these goals and must continue working collaboratively to realize those outcomes in a responsible, technologically neutral, manner which is also mindful of consumer acceptance.

¹ Auto Innovators reaffirmed the commitment made by its predecessor organizations to install a rear seat reminder feature, which prompts parents and caregivers to check the backseat prior to exiting their vehicles, in nearly 100 percent of new cars and trucks by Model Year 2025 or sooner. Another important component to this effort is raising public awareness about the dangers of leaving children unattended in vehicles, which is why industry leaders have joined other organizations to encourage caregivers to "Look Before You Lock". We would encourage policymakers and other stakeholders to support this public awareness effort as well as to draw attention to several products widely available on the market today, such as cell phone apps and car seats with alarms, that can also help remind drivers that there is a child in the rear seat.

Auto Innovators looks forward to continuing to work with Congress in a bipartisan, bicameral way in pursuit of a surface transportation package that advances our shared vision for a safer, cleaner, and smarter future for the traveling public.

Sincerely,



John Bozzella

President & CEO

CC:

Members of the House Committees on Energy & Commerce

Members of the House Committee on Transportation & Infrastructure

Members of the Ways & Means Committee

About the Alliance for Automotive Innovation

Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. The newly established organization, a combination of Global Automakers and Alliance of Automobile Manufacturers, is directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country. Members include U.S. operations of international motor vehicle manufacturers, original equipment suppliers, technology and other automotive-related companies and trade associations. The Alliance for Automotive Innovation is headquartered in Washington, DC, with offices in Detroit, MI and Sacramento, CA.