March 5, 2018

Brandy L. Hendrickson  
Acting Administrator  
Federal Highway Administration  
US Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

Subject: “Automated Driving Systems” (Docket No. FHWA-2017-0049)

Dear Acting Administrator Hendrickson:

On behalf of the members of The American Association of State Highway and Transportation Officials (AASHTO) and the Alliance of Automobile Manufacturers (“Alliance”) we are pleased to submit a joint association letter supporting the continued involvement and engagement by the Federal Highway Administration (FHWA) that will support the development and deployment of Automated Driving Systems. Both AASHTO and the Alliance are submitting separate comment letters addressing the “Automated Driving Systems” Request for Information (Docket Number FHWA-2017-0049), published in the Federal Register on January 18, 2018. While each organization has its individual views reflected in our separate comments, these comment letters complement each other in many ways. We do believe it is important to submit this joint letter to demonstrate our continued collaboration with each other and FHWA.

Both AASHTO and the Alliance believe that ADS-equipped vehicles and related safety technologies have the potential to significantly improve overall safety on our nation’s roadways. We also believe that developing the infrastructure to support vehicle connectivity is another important component to improving the safety and mobility on our nation’s roadways. This infrastructure includes tested and proven V2X technologies and associated protocols still in development (whether public or private or both) to facilitate and accelerate their widespread adoption. With this infrastructure in place, vehicle-to-everything technologies have potential to extend and enhance the sensing and response capabilities of both conventional and ADS-equipped vehicles, and to share information among all road users to help avoid potential conflicts and crashes. Connected and automated vehicles (CAVs) have great potential to not only improve safety, but to enhance mobility and reduce the environmental impact of surface transportation systems.

As you read through both the AASHTO and the Alliance comments, you will see a common theme of continued industry collaboration among USDOT, state and local transportation agencies, and the private sector. The involvement of all three stakeholder groups—working in a cooperative and collaborative manner—will be crucial to the successful deployment of CAVs.
AASHTO and the Alliance appreciate FHWA's current leadership and involvement in supporting the research, development and deployment of CAVs and hope that you will continue to take a strong leadership position in the future.

The transformative nature of CAVs is just now coming into focus. As the asset owners, it is critical that the AASHTO members maintain and make improvements to our roadway infrastructure which will universally accelerate the deployment of these technologies and bring their associated benefits to the public sooner. In addition, it is important that the members of the Alliance speak with a single voice in sharing what their needs and requirements are relative to the transportation infrastructure to ensure the technology works. FHWA can serve as the facilitator to ensure the dialog and discussion continues.

AASHTO and the Alliance look forward to continuing to work with FHWA and the rest of the USDOT modal administrations in the implementation of CAVs. If you would like to discuss the issues raised in this letter, please contact Matthew Hardy, Ph.D., AASHTO’s Program Director for Planning and Performance Management at (202) 624-3625 or mhardy@aashto.org, or Jonathan Weinberger, the Alliance’s Vice President of Innovation and Technology at (202) 326-5531 or jweinberger@autoalliance.org.

Sincerely,

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