



**Telecommunications Industry Association**

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May 20, 2019

The Honorable Heidi King  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE  
West Building  
Washington, DC 20590

Re: Docket No. NHTSA-2019-0016

Dear Deputy Administrator King:

On behalf of the Telecommunications Industry Association (TIA), the leading trade association for global manufacturers, vendors, and suppliers of information and communications technology, I write to share our support for the Safety Petition filed by General Motors, LLC (“GM”).

Existing high-speed communications networks and infrastructure, built and enabled by TIA member companies, are the cornerstone of autonomous vehicle (AV) technologies. The deployment of AVs has the awesome potential to save lives, create jobs, expand mobility options, and lead to more efficient and connected communities as well as ensuring the United States remains a leader in this critical arena.

However, to fully ensure the successful deployment of this technology, it is critical that companies like GM have the ability to test and collect data on how these vehicles operate in the real world. To that end, granting GM’s petition will help accelerate the development, testing, and deployment of autonomous vehicle technologies.

Autonomous vehicle technologies represent a historic opportunity, from the potential to significantly reduce the number of vehicle crashes while simultaneously expanding mobility options, to decreasing congestion and carbon emissions. Simply put, self-driving cars will reduce car crashes and save lives while enhancing the mobility of Americans who do not own or operate cars. Government data indicates that approximately 94 percent of all vehicle crashes on U.S. roads are caused by human error, and it is estimated that more than 37,000 deaths – a preventable loss of life – related to motor vehicle collisions occurred in 2017. As for people with disabilities or who live in communities underserved by public transit, autonomous vehicles present an opportunity for greater independence while potentially helping spur economic activity.

To truly unlock the benefits of self-driving cars, however, changes to existing vehicle safety standards are needed in order to allow the deployment of autonomous vehicle technologies.

While such changes are being debated, the GM petition represents an opportunity for U.S. leadership in the development of critical lifesaving technology and the advancement of transportation innovation.

TIA respectfully urges the National Highway Traffic Safety Administration to approve GM's petition. Additionally, we also urge the Administration to initiate a rulemaking aimed at updating current vehicle safety standards to incorporate highly automated vehicles.

As NHTSA considers this petition and updated guidance and rulemaking for the development, testing, and deployment of self-driving vehicles, we hope the agency continues its support for innovation through the safe development and deployment of this technology across the country.

Thank you for your attention to this matter.

Sincerely,

Cinnamon Rogers  
Senior Vice President, Government Affairs  
Telecommunications Industry Association