



April 8, 2022

VIA ELECTRONIC FILING

Vincent White, Jr.
Senior Advisor for Innovation
Office of the Secretary
U.S. Department of Transportation
1200 New Jersey Ave, NE
Washington, D.C. 20003

Michael Shapiro
Deputy Asst Secretary for Economic Policy
Office of the Secretary
U.S. Department of Transportation
1200 New Jersey Ave, NE
Washington, D.C. 20003

RE: Request for Comment on Non-Traditional and Emerging Transportation Technology (NETT) Council

Dear Senior Advisor White and Deputy Assistant Secretary Shapiro:

The Alliance for Automotive Innovation (“Auto Innovators”) appreciates the opportunity to submit comments the U.S. Department of Transportation (“DOT”) in response to its request for comment on projects, issues, or topics that DOT should consider through the Non-Traditional and Emerging Transportation Technology (“NETT”) Council. Auto Innovators appreciates the DOT’s continued engagement with stakeholders on innovative transportation technologies and welcomes the opportunity to provide input and feedback on this issue.

Auto Innovators is the singular, authoritative, and respected voice of the automotive industry. Focused on creating a safe and transformative path for personal mobility, Auto Innovators represents the manufacturers that produce nearly 98 percent of cars and light trucks sold in the United States, original equipment suppliers, technology companies, and others within the automotive ecosystem. The automotive industry is the nation’s largest manufacturing sector, contributing \$1.1 trillion to the United States economy and representing 5.5 percent of the country’s GDP. As a significant engine for our nation’s economy, the automotive sector is responsible for 10.3 million jobs and \$650 billion in paychecks annually.

Automotive companies are leaders in innovation and are researching, developing, and deploying cutting-edge technologies that are transforming mobility and steering us towards a cleaner, safer, and smarter transportation future. For that reason, we strongly support efforts to promote a regulatory environment that embraces transportation innovation and reduces impediments to the prompt and safe deployment of new technologies. We recognize that the NETT Council can play an important role in fostering cross-modal coordination on non-traditional and emerging technologies and developing DOT-wide processes, solutions, and best practices.

However, there is an important distinction between emerging technologies that are in the early stages of development and new technologies that have already been introduced or are nearing introduction to the consumer market. In the case of near-term technologies, the existing regulatory authority and enforcement responsibilities of the modal agencies apply and should prevail. We encourage the NETT Council to focus on longer-term technologies that are many years away from commercial deployment and for which it can provide useful guidance and insight.

For example, there are regulatory efforts already underway at the National Highway Traffic Safety Administration and the Federal Motor Carrier Safety Administration to support the safe and responsible testing and deployment of automated vehicles (AVs). Transferring or shifting responsibility for AV technology to the NETT Council at this juncture would almost certainly defer or postpone regulatory progress in this area, unnecessarily impeding the development of the federal framework needed to fully realize the technology's important benefits.

We appreciate the opportunity to provide this feedback to DOT on this effort. We look forward to continuing to work with you on this and other matters of importance to the auto industry.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary M. Cain". The signature is stylized, with a large "H" and "C" and a horizontal line extending to the right.

Hilary M. Cain
Vice President
Technology, Innovation, and Mobility Policy