

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on Regulations Relating to
Passenger Carriers, Ridesharing, and New Online-
Enabled Transportation Services

R.12-12-011
(Filed December 20, 2012)

**OPENING COMMENTS OF ALLIANCE FOR AUTOMOTIVE INNOVATION ON PROPOSED
DECISION AUTHORIZING DEPLOYMENT OF DRIVERED AND DRIVERLESS
AUTONOMOUS VEHICLE PASSENGER SERVICE**

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Dated: November 4, 2020 in Washington, DC

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The Alliance for Automotive Innovation (“Auto Innovators”)¹ respectfully submits these comments to the California Public Utilities Commission (the “Commission”) in response to its proposed decision authorizing the deployment of an automated vehicle (“AV”) passenger service with and without a human driver located in the vehicle.

Auto Innovators commends the Commission for taking this important and necessary step to allow AVs to be commercially deployed in drivered and driverless passenger service programs. The Commission’s goals, as outlined in the proposed decision, cannot be fully achieved without the ability for AV entities to commercially deploy their technology. To that end, fare collection is a necessary aspect of a successful AV passenger service program. The allowance of fare collection will allow participating entities to collect consumer feedback on this aspect of their service, which will inform the processes and procedures that will ultimately impact a broad consumer base. Further, the allowance of fare collection may incentivize new AV developers to deploy in

¹ The Alliance for Automotive Innovation is the leading advocacy group for the auto industry, representing 37 innovative manufacturers and value chain partners who together produce nearly 99 percent of all light-duty vehicles sold in the United States. Members include motor vehicle manufacturers, original equipment suppliers, technology and other automotive-related companies and trade associations.

California. The Commission's goals, as outlined in the proposed decision, cannot be fully achieved without the ability for AV entities to commercially deploy their technology.

Auto Innovators also commends the Commission for authorizing shared rides from the driverless deployment program. As stated in the proposed decision, many of the equity and environmental benefits of AVs are enabled through ridesharing with multiple parties. Fare-splitting lowers the cost per passenger and optimization of routing for multiple passengers can result in environmental benefits.

Overall, while Auto Innovators supports many aspects of the Commission's proposed decision, we have concerns with a few aspects of the program and propose the following recommendations:

RECOMMENDATION 1: The application process should not include a Tier 3 Advice Letter. The proposed application process includes the publication of an Advice Letter which is voted on by the Commission following a public comment period. This is not standard practice for Transportation Network Companies or Charter-Party Carriers and would unnecessarily delay the review period for an application. Instead, the review and approval or denial process should remain consistent with the existing process for a pilot permit.

RECOMMENDATION 2: The Commission should review its applications concurrently with the DMV's review of their permit applications. Creating a review process that happens in parallel, versus sequentially, would avoid unnecessary and potentially lengthy delays for deployment.

RECOMMENDATION 3: The reporting requirements should be on a bi-annual or annual basis, not quarterly. This frequency would align better with the goals of the

Commission's deployment programs. While quarterly reporting has worked for the pilot program, this cadence would potentially disincentivize entities from applying to the program and deploying in California. Bi-annual or annual reporting satisfies the Commission's goals of transparency while creating an environment where AV developers would be able to deploy.

RECOMMENDATION 4: The requirement to report idle or dwell time should not include time spent in productive use, such as training the AV system or otherwise providing updates to the vehicle software. While we understand the Commission's interest to track idle or dwell time in order to assess impacts to congestion, the inclusion of time spent in productive use may disincentivize participating companies from providing helpful updates to their vehicles. The Commission should balance the desire to track the time spent between rides with the benefits that could come from AV training that could further improve and optimize the system at large.

Auto Innovators appreciates this opportunity to share its comments and recommendations. We look forward to any follow-up with the Commission to answer questions or provide additional information.

Sincerely,

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