



March 17, 2022

Mr. George Nicols
Chair, On-Road Automated Driving Task Force
SAE International
c/o Toyota Motor North America, Research and Development
1555 Woodridge Avenue
Ann Arbor, MI 48105

Dear Mr. Nicols:

The Alliance for Automotive Innovation (“Auto Innovators”) appreciates your continued leadership on J3016, *Taxonomy and Definitions for Terms Related to On-Road Motor Vehicle Automated Driving Systems*. The On-Road Automated Driving Committee has done extraordinary work in developing and maintaining this critical foundational document for the industry.

Focused on creating a safe and transformative path for personal mobility, Auto Innovators represents the manufacturers that produce nearly 99 percent of cars and light trucks sold in the United States, original equipment suppliers, technology companies, and others within the automotive ecosystem. Auto Innovators strongly believes in the potential of automated driving features to significantly improve roadway safety, provide important environmental benefits, and increase access to mobility. To this end, we are strong advocates for a federal framework that supports the safe and responsible testing and deployment of automated driving features at scale in the U.S.

In furtherance of this goal, we have become increasingly concerned about persistent confusion among consumers and policymakers over the critically important difference between partial automation (Level 2) and automated driving systems (Level 3-5), particularly as it relates to the responsibility of a human driver in the driver’s seat. It has become apparent to us that industry, government, and other stakeholders need to focus even more attention on clarifying the essential difference between these systems.

We recognize and value SAE’s recent efforts to attempt to address this issue. For instance, the updated SAE J3016 Levels of Driving Automation graphic that was released last year helps by more clearly delineating between driver support features and automated driving features. That being said, we are interested in further discussions with SAE on additional supporting or clarifying materials that could be developed or further modifications that could be made to SAE J3016 or the supporting materials that have already been developed that may provide further clarity and reduce confusion. We are also interested in any ideas that SAE may have on work that other industry partners, such as Auto Innovators, could be doing to support, amplify, or complement SAE’s work in this area.

We appreciate your significant contributions and collaboration. We look forward to working with you on this important issue and welcome the opportunity to meet with you in the coming weeks to discuss potential opportunities.

Sincerely,

A handwritten signature in black ink, appearing to be 'H. Cain', with a long horizontal stroke extending to the right.

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

cc: Chad Zagorski, Chair – Active Safety Terms and Definitions Task Force
John Campbell, Chair – Naming Methodology for Driver Assistance and Automation Task Force
Jennifer Collins, SAE International
Mark Zar, SAE International

