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**Deb Peters**  
*Senator – District 9*  
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*Fiscal Analyst*  
*Office of Budget Review*  
*Legislative Research Commission*  
*Kentucky*  
*Staff Chair, NCSL*

**William T. Pound**  
*Executive Director*

March 5, 2018

The Honorable Ms. Brandye L. Hendrickson  
Acting Administrator, Federal Highway Administration  
National Highway Traffic Safety Administration  
US Department of Transportation  
1200 New Jersey Avenue SE  
Washington, D.C. 20590

Docket ID No. FHWA-2017-0049

Dear Acting Administrator Hendrickson:

The National Conference of State Legislatures (NCSL), the bipartisan organization representing the legislatures of our nation's states, territories and commonwealths, appreciates the opportunity to provide input on the Federal Highway Administration's (FHWA) "Automated Driving Systems" Request for Information.

States have great interest in the development and likely deployment of connected and automated vehicles (CAV) given their potential to improve safety, enhance mobility and reduce the environmental impact of surface transportation systems. However, as owners of a significant share of our nation's surface transportation infrastructure, we remain concerned with the substantial uncertainty that exists regarding the future of motor vehicle travel and how such changes might impact the additional demands these vehicles place on state budgets in this ever-tightening fiscal environment. Specifically, how the introduction of CAVs may influence vehicle ownership, vehicle miles travelled, inter-and-intrastate freight services, transit ridership, and shared mobility. To help mitigate this uncertainty, we believe there are several important actions the federal government can take:

- Engage in a formal consultation process with states so that FHWA can effectively communicate its vision for CAVs while also providing states the opportunity to update our federal partners concerning the cost and benefits of CAV deployment.
- Set national standards for original equipment manufacturers to install the necessary technology so that states can take full advantage of the efficiencies and safety benefits provided by interoperable systems that enable vehicle-to-vehicle and vehicle-to-roadside communications.

**Denver**  
7700 East First Place  
Denver, Colorado 80230-7143  
Phone 303.364.7700 Fax 303.364.7800

**Washington**  
444 North Capitol Street, N.W. Suite 515  
Washington, D.C. 20001  
Phone 202.624.5400 Fax 202.737.1069

Website [www.ncsl.org](http://www.ncsl.org)  
Email [info@ncsl.org](mailto:info@ncsl.org)

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- Provide flexibility in existing FHWA grant programs to help states responsibly address and facilitate a uniform, efficient, and effective CAV deployment and implementation.
- Promote the practice of data sharing in order to assist states in accessing data for CAV planning and operations, while noting that privacy protections must be developed and incorporated into all policies and practices, and any information collected should be governed by state laws.
- Encourage the cooperation of states and the private sector in order to help ensure the efficient deployment of this technology.

NCSL looks forward to continuing dialogue with the agency as the discussion and regulatory process surrounding CAVs moves forward. Please contact NCSL staff, Ben Husch ([ben.husch@ncsl.org](mailto:ben.husch@ncsl.org), 202-624-7779) and Kristen Hildreth ([kristen.hildreth@ncsl.org](mailto:kristen.hildreth@ncsl.org), 202-624-3597) with any additional questions.

Sincerely,



Representative Curt McCormack  
Vermont House of Representatives  
Co-Chair, Natural Resources and Infrastructure  
Committee, NCSL



Representative Ed Orcutt  
Washington House of Representatives  
Co-Chair, Natural Resources and Infrastructure  
Committee, NCSL