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Douglas Ito
California Public Utilities Commission
Consumer Protection and Enforcement Division
505 Van Ness Avenue
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Re: Support of Cruise's Autonomous Vehicle Passenger Service Application

Dear Mr. Ito,

As an expert in the transportation industry, I would like to provide support of Cruise's recent Autonomous Vehicle Passenger Service Application. My academic and professional work over the past two decades has explored the potential of transportation technology, and I find myself in a unique position to speak to the potential benefits of electric, autonomous and shared mobility. Advances in automation offer opportunities to reshape cities and improve the socio-economic health of cities and residents in California and beyond—reducing collisions, facilitating more sustainable travel, and increasing network efficiency. In this context Cruise's Application represents not only a symbolic milestone for the AV industry, but more importantly an opportunity for California to accelerate the safety, environmental, and accessibility benefits of autonomous vehicle (AV) transportation.

First, it is important to emphasize the safety benefits of accelerating AV technology. In order to improve road safety and reduce traffic violence on California's roads, we need to make real changes in both how drivers behave and to the infrastructure that allows those actions to occur. According to recent data from NHTSA more than 6,200 pedestrians and nearly 900 bicyclists are killed each year as a result of collisions with motor vehicles. Over 38,000 Americans lost their lives on U.S. roads in 2020, with fatality rates jumping the most in nearly a hundred years. In San Francisco alone, there are 3,100 auto-related injuries and 27 traffic deaths per year.

Approving AV deployments helps to move toward the goal of zero traffic facilities. In the case of Cruise, their commitment to this goal is validated by their support of the Biden Administration's Vision Zero Network's #ZeroTrafficDeaths target of eliminating traffic casualties. The company also supported important legislation, AB 43, which is now law, allowing cities to reduce speed limits on certain high-injury network corridors. This framework provides an opportunity to match the newest technology to support multi-modal corridors (such as the many slow streets that arose during the pandemic). The technology allows for those slow zones to be programmed into the vehicles themselves providing a new ways of thinking about human and vehicle interactions in cities. Cruise representatives have regularly participated in discussions with planners, advocates, and researchers about the company's progress and approach to safety—including at my annual Autonomous Vehicles & the City Symposium—and this kind of willingness to partner illustrates the emphasis they place on safety both inside and outside the vehicle.

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Secondly, the Cruise application offers an environmental benchmark. If California wants to meet its climate goals, it needs to electrify transportation rapidly, as it is responsible for 40% of greenhouse gas emissions in the state. Cruise was the first AV company in the automotive space industry to operate a fully electric fleet, and remains the first and only AV company to power its vehicles with renewable energy. The companies' "Farm to Fleet" initiative, which was launched in early 2021 provides a creative approach to powering zero-emission, driverless vehicle fleets from solar power generated on farms in California's Central Valley. These innovative partnerships not only support the AV industry, they support a more circular economy and generate increased opportunities for agricultural economic sector—farmers gaining extra revenue and more opportunity from selling renewable energy credits to Cruise.

This approach should be supported and replicated. California needs companies working across sectors and industries to address the climate crisis; as well as public and private institutions working together to develop sustainable solutions that benefit our society. With Cruise scaling commercial operations, the benefits of these partnerships have the potential to grow throughout the state and across industries. Rural farmers can potentially generate income by supplying renewable energy to vehicles, engineers can get new jobs scaling renewable energy infrastructure, and consumers can reduce their carbon emissions traveling in zero-emission vehicles.

Lastly, on the accessibility front, Cruise is leading the industry in terms of its approach to more inclusive transport and ability to fill gaps in the existing transportation network. AVs present a unique opportunity to restore freedom of mobility to millions of Americans that face challenges in today's transportation landscape—including those across the blind and low vision communities, wheelchair users, and those with physical disabilities. Earlier this year, Cruise released a Wheelchair Accessible Variant prototype of its Origin shared AV, which could transform the access for those with disabilities and allow for service that exceeds the requirements of the Americans with Disabilities Act.

To conclude, this moment is not only important for California today, it will also set a tone for how the rest of the AV industry will approach commercial deployment into the future. Cruise has consistently been at the forefront of how AV companies should approach their services—clean, safe, clean and inclusive—and their application sets a high standard for others to follow. Given this, I encourage the CPUC to approve Cruise's Application.

Sincerely,

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