



November 29, 2021

Douglas Ito  
California Public Utilities Commission  
Consumer Protection and Enforcement Division  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

Dear California Public Utilities Commission Commissioners,

I'm writing on behalf of the Chamber of Progress in support of Cruise's Autonomous Vehicle Passenger Service Application. We are a center-left tech industry coalition promoting technology's progressive future; our organization works to ensure that all Americans benefit from technological leaps.

The widespread commercial adoption of autonomous vehicles would make streets safe, close accessibility and transit gaps, promote sustainability efforts, and provide California residents the convenience they need to manage life on a day-to-day basis.

**First, autonomous vehicles will bring safer streets and reduce the number of accidents.** As of October 2021, there have been 24 traffic fatalities in San Francisco this year.<sup>1</sup> Just this month, beloved elementary school paraeducator and San Francisco native Andrew Ziemann was tragically struck and killed by a driver that ran a red light.<sup>2</sup> Research shows that at least 90% of car crashes are caused by human error, and studies suggest that putting autonomous vehicles on the road now could save hundreds of thousands of lives over the long term. By eliminating cases of distracted drivers, drivers under the influence, or geographically lost drivers, autonomous vehicles can reduce the number of pedestrian and bike fatalities that occur in the state.

As U.S. Transportation Secretary Pete Buttigieg recently commented in support of autonomous vehicles, "There is tremendous upside potential with autonomous driving and driver assistance. Look, we just got some tough numbers for roadway deaths in this country — more than 30,000 people a year losing their lives. So the status quo is clearly unacceptable. To put it bluntly, human drivers don't have the best track record."<sup>3</sup>

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<sup>1</sup>Traffic Fatalities, SFMTA (Nov. 2021), <https://www.sfmta.com/reports/traffic-fatalities>.

<sup>2</sup> Woman Arrested in Crash that Killed SF Educator, ABC 7 News, (Nov 2021), <https://abc7news.com/andrew-ziemann-sf-sherman-elementary-san-francisco/11228961/>.

<sup>3</sup> Brian Sozzi, Transportation Secretary Pete Buttigieg on autonomous driving technology: Drivers must still pay attention, Yahoo! News, (Nov. 2021), <https://news.yahoo.com/transportation-secretary-pete-buttigieg-on-autonomous-driving-technology-drivers-must-still-pay-attention-175940478.html>.

**Second, autonomous vehicles will help close the accessibility gap.** One in ten people in San Francisco live with a disability.<sup>4</sup> Though public transit is available, it's harder for those with disabilities to navigate by bus in times of inclement weather, when an accessible stop isn't available, or when there is no room for their equipment on a busy day. United Spinal Association's President and CEO James Weisman agrees that an "accessible manufactured autonomous vehicle would be a life's game changer."<sup>5</sup> For the blind, seniors, and other people living with disabilities, nonvisual accessibility and safe autonomous vehicles can't arrive fast enough.

**Third, autonomous vehicles will help close the transit gap.** From 2010 to 2018, San Francisco saw a 9% increase in new residents, a 29% increase in new jobs, and is forecasted to add an additional 73,400 units of housing and 275,000 more jobs by 2040.<sup>6</sup> Though plans have been made to improve public transit by putting 98% of San Francisco residents within two to three blocks of a transit stop, "[t]his metric...does not measure the service's frequency or reliability."<sup>7</sup> Autonomous vehicles will allow residents to hail rides and carpools as needed throughout the day and night, providing a reliable and affordable means of transportation for commuters and students to get from one destination to another.

**Fourth, autonomous vehicles will make it easier for residents to live in the city without a car overall.** By allowing the deployment of autonomous vehicles, the CPUC can facilitate a more livable city by providing residents quick use of a vehicle for errands, making their lives a lot easier. Even with increased use of micromobility in San Francisco, enclosed transportation for rainy days, rides to business meetings, and multi-seater vehicles for groups of people are still needed. Autonomous vehicles will also take the financial and capacity load off of the public transit system, giving riders more space to sit comfortably and social distance in the wake of the Covid-19 pandemic.

**Fifth, autonomous vehicles can positively impact the environment and promote sustainability efforts.** Autonomous vehicles will cut down on the amount of emissions and gas usage in San Francisco. Through high-speed driving, braking, and re-acceleration, humans burn a lot of gas and energy while driving.<sup>8</sup> Since autonomous vehicles are programmed to follow traffic rules and speed limits, autonomous vehicles will ultimately burn less gas and energy, cutting down on harmful toxins released into the environment. According to the Southwest Research Institute, through connectivity and automation, vehicles can reach 20% improvement in fuel efficiency.<sup>9</sup> By using technology that "looks ahead" and anticipates traffic patterns, autonomous vehicles can take more efficient routes that cut down on fuel consumption.

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<sup>4</sup> *Disability in San Francisco*, San Francisco Human Services Agency, (Nov. 2021), <https://www.sfhsa.org/about/reports-publications/disability-san-francisco#:~:text=Department%20of%20Disability%20and%20Aging,the%20future%20of%20our%20City>

<sup>5</sup> *United Spinal is Driving Access to Autonomous Vehicles*, United Spinal Association, (Nov. 2021), <https://unitedspinal.org/united-spinal-is-driving-access-to-autonomous-vehicles/>.

<sup>6</sup> *Closing the Transportation Funding Gap*, San Francisco County Transportation Authority, (Nov. 2021) <https://www.sfta.org/policies/closing-transportation-funding-gap>

<sup>7</sup> Carly Graf, *More changes coming to Muni this summer*, San Francisco Examiner, (Nov. 2021), <https://www.sfoxaminer.com/news/more-changes-coming-to-muni-this-summer/>

<sup>8</sup> Ashleigh Rose-Harman, *The Environmental Benefits of Driverless Cars*, Greener Ideal, (Nov. 2021), <https://greenerideal.com/news/vehicles/driverless-cars-environmental-benefits/>.

<sup>9</sup> *SwRI Achieves 20% Improvement in Vehicle Fuel Efficiency with Connectivity, Automation*, Southwest Research Institute, (Nov. 2021) <https://www.swri.org/press-release/vehicle-fuel-efficiency-improvement-connectivity-automation-arpa-e-nextcar>.

With the tremendous potential of autonomous vehicles to make California a safer, more accessible, and more equitable state, it is important to deploy autonomous vehicles without delay. For the sake of supporting those with disabilities, addressing transit gaps, reducing traffic deaths, and promoting sustainability efforts, we encourage you to support Cruise's Autonomous Vehicle Passenger Service Application.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'M Williams', followed by a long horizontal line extending to the right.

Montana Williams  
Director of State & Local Public Policy