May 30, 2023

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
Consumer Protection and Enforcement Division
505 Van Ness Avenue
San Francisco, CA 94102-3214
Submitted via email at: AVPrograms@cpuc.ca.gov

SUBJECT: AVIA's Support of Draft Resolution TL-19145 to Approve Authorization for Cruise LLC's Expanded Service

Dear Commissioners,

The Autonomous Vehicle Industry Association ("AVIA") writes to express support for Draft Resolution TL-19145 approving authorization for Cruise LLC's ("Cruise") expanded service in the Public Utilities Commission's ("Commission") Autonomous Vehicle ("AV") Passenger Service Phase I Driverless Deployment program. We encourage the Commission to act favorably on Draft Resolution TL-19145.

As background, AVIA is comprised of the world's leading technology, ridesharing, trucking, and automotive companies. Our mission is to realize the benefits of autonomous vehicles (i.e., SAE Levels 4 and 5-capable vehicles) and support the safe and expeditious deployment of these technologies. We have been pleased to be a contributing participant to the Commission's efforts to develop a framework for AVs and appreciate the opportunity to engage with the Commission on this Draft Resolution.

AVs have tremendous safety, mobility, and environmental benefits, holding the potential to save lives, change the way we move goods and people, and contribute to critical sustainability goals. The National Highway Traffic Safety Administration ("NHTSA") estimates that nearly 32,000 Americans died in traffic crashes within the first nine months of 2022, after nearly 43,000 traffic deaths occurred in 2021. These numbers represent a 16-year high and an 11% increase in fatalities from 2020, which is the largest annual percentage increase in the nearly 50 years that NHTSA has maintained these statistics. The U.S. Department of Transportation has also reiterated that the overwhelming majority of these fatalities involve at least one human behavioral issue as a contributing factor. For example, one person is killed every 52 minutes due to drunk-driving. The ongoing tragedy on our roadways underscores the need to support AV deployment. AVs have the potential to reduce fatal traffic crashes because, unlike human drivers, AVs will never drive drunk, drowsy, or distracted—all major contributors to roadway deaths.

Approving requests for service expansions of Phase I Driverless Autonomous Vehicle Deployment Program permits that satisfy all regulatory requirements is a critical step toward bringing more benefits of AVs to the public. The Commission's approval of Cruise's permit request to expand passenger service throughout the day will provide additional opportunities for

individuals in San Francisco to experience the mobility and safety benefits of AVs. This may be particularly impactful for San Franciscans experiencing mobility limitations. San Francisco is home to hundreds of thousands of individuals—including seniors and those with visual impairments—who stand to greatly benefit from the increased safety and mobility that widespread AV deployment will bring. Expanding its service throughout the day will enable Cruise to provide more available service offerings to these individuals and many others. Therefore, to advance the public's interest, we encourage the Commission to act favorably on Draft Resolution TL-19145.

AVIA appreciates the opportunity to comment on Draft Resolution TL-19145. We commend the Commission for its intention to expand the deployment of a fared driverless passenger service, and we encourage the Commission to act favorably on any request to expand a Driverless Deployment Operational Design Domain that satisfies the Commission's requirements, as Cruise's does according to Draft Resolution TL-19145.

Respectfully submitted,

Ariel S. Wolf
General Counsel
Autonomous Vehicle Industry Association
600 Massachusetts Avenue NW
Washington, D.C. 20001
Tel: 202.344.4013
Email: ASWolf@venable.com