January 25, 2023

Douglas Ito, Director
Consumer Protection and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Submitted via Email: AVPrograms@cpuc.ca.gov

Dear Director Ito,

The Autonomous Vehicle Industry Association ("AVIA") writes to express support for Cruise LLC's ("Cruise") application, pursuant to Advice Letter 0002 ("Advice Letter"), for a service expansion of its Driverless Deployment permit issued under the Public Utilities Commission's ("Commission") Phase 1 Driverless Autonomous Vehicle ("AV") Deployment program.

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 Advice Letter.

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. Moreover, California is home to millions 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. In addition to offering safety and mobility benefits, autonomous driving technology can also help reduce traffic congestion, improve environmental quality, and advance transportation efficiency.

Approving applications 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. To advance the public's interest, we encourage the Commission to give Advice Letter 0002 all due consideration. AVIA appreciates the opportunity to support Advice Letter 0002, and we encourage the Commission to act favorably on any permit expansion application that satisfies the agency's requirements.

Respectfully submitted,

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