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

SUBJ: Cruise application to commercially serve a greater population base

Dear California Public Utilities Commission Commissioners,

I am writing on behalf of United Spinal Association in support of Cruise's Autonomous Vehicle Passenger Service Application referenced above. United Spinal is committed to the creation of digital, innovative technologies and physical access to people with disabilities, especially for wheelchair users, in the transportation universe.

United Spinal Association is the largest non-profit organization, founded by paralyzed veterans, dedicated to enhancing the quality of life of all people living with spinal cord injuries and disorders (SCI/D), including veterans, and providing support and information to loved ones, care providers and professionals. United Spinal has over 75 years of experience educating and empowering over two million individuals with SCI/D to achieve and maintain the highest levels of independence, health and personal fulfillment. United Spinal has 46 chapters, close to 200 support groups and more than 100 rehabilitation facilities and hospital partners nationwide including 18 distinguished Spinal Cord Injury Model System Centers that support innovative projects and research in the field of SCI. United Spinal Association is also a VA-accredited veterans service organization (VSO) serving veterans with disabilities of all kinds.

If the Commission approves the wide-scale commercial use of Cruise's driverless vehicle services, and we, as an article of faith, accept Cruise's commitment to employ fully accessible wheelchair vehicles, United Spinal firmly believes a fleet of such vehicles has the potential to improve the daily independence and personal and professional growth of these citizens as they travel.

Though California offers several modes of transportation, there are few if any options which allow mobility challenged individuals to travel long distances without relying on the assistance of another person. With the driverless vehicle ecosystem Cruise has assured us it plans to deploy, passengers will not need to depend on anyone else to physically complete a trip, assuring that travelers of all needs and abilities retain their autonomy.

As Cruise has been consulting with accessibility stakeholders during the development and testing phase of its vehicles in San Francisco, we are confident that Cruise will take our greater disability communities' needs into account as its driverless vehicles evolve into a fully accessible wheelchair accessible fleet.

As for United Spinal's members, the greater mobility challenged community's needs, specifically, certainly the issues of boarding and unboarding, wheelchair self-securement and sufficient systemic emergency response

measures must be fully addressed. Additionally, wheelchair users must have full access to all human-machine interface options available within Cruise's vehicles.

The above most basic elements to a seamless, barrier free trip define accessibility in fundamental practical terms that are self-evident. In our initial discussions with Cruise, the above issues are well within the company's accessibility focus. In addition to our discussions, United Spinal is greatly encouraged by Cruise's commitment to achieve greater accessibility in the pilot program because at the core of the Cruise Passenger Safety Plan is the employment of a continuous and ever evolving solution-oriented passenger feedback process. The feedback process should allow for the timely evolution of physical design and technologies to ensure wheelchair users needs are eventually met. Of course, for this process to work effectively, it will be dependent upon a robust fleet of wheelchair accessible vehicles ultimately being deployed in the testbed.

Cruise has been consistently demonstrating its commitment to our community by refining its process to include not only our community in its future product designs but also making accessibility a basic critical component of future vehicle design. To this end, Cruise shared that it is, "assembling a group of skilled, dedicated and diverse individuals from the disability community to meet quarterly in order to meaningfully inform vehicle and service accessibility."

As the Public Utilities Commission of the State of California (CPUC) "expand(s) the benefits of AV technologies to all communities and demographics,"[1]including power wheelchair users, United Spinal implores the Commission to expedite industry applications to participate in pilot testing programs, like Cruise's, that demonstrate a solid commitment to achieving accessibility. And it is our fervent hope that the CPUC will as expeditiously incorporate automated vehicle technologies accessibility standards in tandem with the evolution of the industries accessibility achievements.

We hope that Cruise's driverless vehicles can soon be commercially utilized across the state, so transportation can come closer to becoming a service that truly includes a vast diversity of all passengers equitably. That's why we urge the CPUC to approve Cruise's Autonomous Vehicle Passenger Service Application, so that riders with disabilities can finally benefit from the transportation freedom most people have enjoyed for generations.

Thank you for considering these comments. Please do not hesitate to contact Kent Keyser, Public Policy Fellow, with any questions at kkeyser@unitedspinal.org.

Sincerely,

Alexandra Bennewith

Alexandra Bennewith, MPA
Vice President of Government Relations

[1] Decision 20-11-046 November 19, 2020 BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA. Order Instituting Rulemaking on Regulations Relating to Passenger Carriers, Ridesharing, and New Online-Enabled Transportation Services. P.38.