

Final - Comments at DMV AV Hearing 20230130

Introduction

- Good morning, I'm Jean Paul Velez with the San Francisco County Transportation Authority – the Congestion Management Agency for San Francisco – where we have been a center of AV testing and deployment
- Thank you for holding this hearing and for the opportunity to participate.
- We offer these comments as partners to the State and the DMV and with the hope of serving the State's vision and principles for AVs in California detailed in the State's AV Strategic Framework

Comment #1 - Data

- Our first comment is that this is an opportune time for the DMV to issue a report summarizing California's experience to date with AV testing and deployment to inform the public, including industry and policymakers, and the new regulations' development process, on the status of the sector including key activities, learnings, outcomes and open questions.
- Very limited data is reported under the DMV's testing or deployment permits, or the CPUC's for that matter making it hard to ascertain the benefits and impacts of AVs on our transportation system.
- We encourage the DMV to develop or commission a comprehensive report on California's experience with AVs to date, including
 - Extent of AV testing and deployment activities in CA by region, and characteristics of supply and demand
 - Total VMT under each permit, events where vehicles become immobile in the right-of-way, safety performance, crash reports, permit revocations
 - Information on any investigations into the operational or safety incidents we have experienced, and their outcomes
- We would be glad to assist or advise on this process, and encourage the DMV to make comprehensive reporting a standard practice, be it quarterly or biannually.

Comment #2 - Requirements for receiving permits and expansion

- Secondly, we recommend updates to the existing requirements for obtaining testing and deployment permits, and for increasing the number of vehicles permitted under such permits
- As AV companies have expanded driverless testing and deployment in San Francisco, we have observed multiple instances in which disabled AVs, or AVs that failed to perform basic maneuvers, resulted in blocked transit lines, intersections, and general traffic lanes
- As such, it is important to clarify and update:
 - Beyond self-certification, what driving maneuvers are AV companies required to demonstrate in order to receive testing and deployment permits in CA
 - Whether permits issued by DMV and the CPUC include a cap or other tools to manage the number of AVs that can be deployed under them

- And how the DMV and CPUC coordinate with each other and with local jurisdictions like San Francisco, facing the impact of AVs' growing pains, on these issues.
- Transparency is key here. We request that, upon approval of permits, the ODD and any other conditions including fleet size of those permits be published on the DMV website.
- But more broadly, we recommend that AV testing and deployment should be carried out in an incremental manner,
 - meaning that the total number of vehicles, geographic area, and other operating parameters
 - should increase gradually, based on demonstrated performance on real streets, and in coordination with local jurisdictions

Comment #3 - Tools for better management of AV ops

- Finally, our experience in San Francisco suggests that additional tools and approaches are necessary to better manage AV operations on California streets
- And, again, we believe local partnerships are an important part of this.
- These tools include:
 - #1 - the establishment of response time targets and other performance standards in cases of vehicle disablements, crashes, or other emergency situations, as part of any DMV or CPUC permit
 - and - in relation to this issue- the establishment of a funding mechanism, perhaps through the existing permit fees, allocated for covering local jurisdictions expenses in managing AV operations and incidents on their streets;
 - #2 - evaluation of permitted activities that draws on local input and partnership. Local transportation agencies, law enforcement and the public should be engaged in assessing AV benefits, impacts and learnings;
 - AND #3 - updating the state traffic and vehicle codes to address AV operations and enforcement.

Closing remarks

- Again, we look forward to collaborating to move our state and this industry forward
- Thank you for this opportunity to comment.