

## DMV AV Regulation Workshop 7/14/2023

### TA Testimony -

- Good morning, my name is Drew Cooper and I'm with the SF County Transportation Authority. We are the congestion management agency for SF and want to thank DMV for holding today's workshop
- We appreciate the DMV's willingness to revisit important elements of the existing AV light duty permitting program, as we had requested in the January workshop. We particularly appreciate the focus on data reporting for safety and operational evaluation, incremental performance-based permit expansion, and certification of road-readiness
- San Francisco has valuable expertise and experience to assist the DMV in refining its regulations and we offer our partnership.
  - We have on-the-ground experience with testing and deployment on our city streets.
  - We have worked for years on TNC and AV data reporting requirements, and have done leading research on the impacts of TNCs on transportation in San Francisco.
- DMV does not need to start from scratch.
  - The CPUC's recent AV data reporting staff proposal and workshop provide a strong foundation.
  - We encourage DMV to coordinate with CPUC to harmonize reporting requirements to reduce reporting burden for the companies and to make the data consistent and easier to use by analysts and the public.
- The purpose of collecting data is to evaluate performance. This should inform permitting decisions and provide the public with information on how AVs impact safety and the operations of the transportation system.
- To support this:
  - Data should be reported at every phase of deployment, from testing with a safety driver and continuing through full driverless deployment, and should not end once a company receives a deployment permit.
    - Based on human driving, Some safety incidents/events would not be expected to happen until 10s or even 100s of millions of miles are driven which would occur well into deployment.
  - Data should be made public to support transparency and public trust
- Finally, we propose that, like humans, AV driving systems need to pass driver's tests to demonstrate their competence to operate on public roads.
- Again, we thank the DMV for this opportunity to provide input and we look forward to ongoing collaboration on this important topic.