

2023 RRAI House Bill 806 Support Written Support-F

Uploaded by: Ashlie Bagwell

Position: FAV



Testimony in SUPPORT of
House Bill 806—Vehicle Laws—Autonomous Vehicle Converters—Sale of Autonomous
Vehicles

House Environment and Transportation Committee
February 23, 2023

Formed in 2002 by two former NIST scientists, Robotic Research (branded as “RRAI”) began as, and remains, a Montgomery County based robotics and technology company. We are a global leader of automated driving systems for defense and commercial markets. Our company has grown to over 300 employees, 62% of which call Maryland home. Needless to say, we are extremely proud of our Maryland roots and the company that we have become. We appreciate the opportunity to provide comments on House Bill 806.

House Bill 806 is a very simple, straightforward bill. It would allow a narrowly defined autonomous vehicle converter to sell vehicles intended for commercial or industrial use that meet certain weight thresholds established in federal law. Specifically, RRAI’s business model is such that we purchase vehicles, install our autonomous technology and then sell these vehicles to customers. We never intended to be an automobile dealer. In fact, dealer license requirements like car lots, signage for customer parking and parking lot lighting are not applicable to our work. However, a person selling three or more vehicles within a twelve-month period may be considered an unlicensed dealer. Therefore, this bill specifies that companies like RRAI can provide vehicles equipped with autonomous technology to customers but not be considered a dealer and therefore not require a Maryland dealer’s license.

RRAI is proud to call Maryland home, and we look forward to continuing to grow our business in the State. We thank Delegate Qi for her leadership on this issue, and we urge a favorable vote on House Bill 806.

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Uploaded by: Ashlie Bagwell

Position: FAV



Gaithersburg-Germantown Chamber of Commerce, Inc.

February 20, 2023

Hon. Delegate Kumar Barve, Chair
Hon. Delegate Dana Stein, Vice Chair
Environment and Transportation Committee Room 251
House Office Building Annapolis, MD 21401

Re: HB 806 – Vehicle Laws—Autonomous Vehicle Converters—Sale of Autonomous Vehicles

Hearing Date: February 23, 2023

Position: Support

Dear Chairman Barve, Vice Chairman Stein, and Committee Members:

The Gaithersburg-Germantown Chamber of Commerce was founded in 1949. Since then, the organization has grown to more than 470 members representing over 50,000 area employees. On behalf of these members, we appreciate the opportunity to provide written comments on House Bill 806—Vehicle Laws—Autonomous Vehicle Converters-Sale of Autonomous Vehicles.

The Gaithersburg-Germantown Chamber of Commerce is proud to support one of its members, RRAI, as they continue to grow their footprint and their business in Montgomery County. House Bill 806 allows companies like RRAI to sell industrial and commercial vehicles installed with their autonomous technology to customers without being considered an automobile dealer under Maryland law. This narrowly tailored legislation avoids unintended consequences while at the same time supports an innovative company. This bill not only supports growing Maryland autonomy businesses, like RRAI, but Maryland components suppliers that manufacture and supply parts for these companies, as well.

We appreciate the opportunity to lend our support to this legislation, and we urge a favorable vote on House Bill 806.

Sincerely,

Paula Ross,
President & CEO



HB 806_Autonomous Vehicles_Support.pdf

Uploaded by: Jennifer LaHatte

Position: FAV



Wes Moore | Governor
Aruna Miller | Lt. Governor
Kevin A. Anderson | Secretary of Commerce
Signe Pringle | Deputy Secretary of Commerce

DATE: February 23, 2023
BILL NO: House Bill 806
BILL TITLE: Vehicle Laws – Autonomous Vehicle Converters – Sale of Autonomous Vehicles
COMMITTEE: House Environment & Transportation
POSITION: Support

The Maryland Department of Commerce (Commerce) supports House Bill 806 - Vehicle Laws – Autonomous Vehicle Converters – Sale of Autonomous Vehicles.

Background:

House Bill 806 changes certain regulations related to the conversion and sale of commercial and industrial autonomous vehicles. This bill also adds a definition of Autonomous Vehicle Converters and Converted Autonomous Vehicles. It limits the intent of the changes in regulations to motor vehicles “intended for commercial or industrial use,” thereby not exempting consumer vehicles. Finally, it allows an Autonomous Vehicle Converter to sell, transfer, lease, offer for sale or resell a Converted Autonomous Vehicle or a motor vehicle purchased by an Autonomous Vehicle Converter with the intent to convert the motor vehicle into a Converted Autonomous Vehicle.

Rationale:

Current Maryland law is constraining to several companies in Maryland that convert existing industrial and military equipment into autonomous vehicles. Commerce has had interactions with at least one such company that has considered moving to Virginia as a result, but fortunately Virginia’s laws are equally restrictive. House Bill 806 will give Maryland a competitive advantage for retaining and attracting future autonomous vehicle manufacturers.

Commerce respectfully requests a favorable report on House Bill 806.

HB 806 AVC Del. Qi Testimony .pdf

Uploaded by: Lily Qi

Position: FAV

LILY QI
Legislative District 15
Montgomery County

Economic Matters Committee

Chair
Business Regulation Subcommittee



The Maryland House of Delegates
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Annapolis, Maryland 21401
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THE MARYLAND HOUSE OF DELEGATES
ANNAPOLIS, MARYLAND 21401

February 23, 2023

Dear Members of the Environment and Transportation Committee,

HB 806 adjusts Maryland's dealer laws to remove businesses who install Autonomous Vehicle Converters into industrial/commercial vehicles and then sell to their customers from the definition of a "dealer" in Maryland's statute.

Maryland has several businesses who purchase commercial or industrial vehicles in order to install their own AVC technology, and then sell these updated vehicles to their customers. In Maryland, if you sell three or more vehicles over the course of a year, you are considered a dealer. This unintentionally makes many these businesses "dealers." This delineation comes with other requirements that these businesses do not necessarily need, such as a service center, parking lot, and showroom.

This bill will allow these businesses to sell vehicles equipped with their autonomous technology while remaining compliant with Maryland's dealer laws. The bill has also been narrowly tailored to eliminate the possibility of any unintended consequences.

The businesses who are selling these vehicles are not selling to the average consumer, they are selling to the Department of Defense, construction companies, and transit operations. These are not vehicles being sold to drive around town.

Please do not hesitate to reach out with any questions, and I urge a favorable report.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lily Qi'.

Delegate Lily Qi

Ext. Comm. - Testimony - 2023 - Maryland HB 806 -

Uploaded by: Joshua Fisher

Position: FWA



February 21, 2023

The Honorable Kumar Barve
Chair, House Environment and Transportation Committee
Room 251, House Office Building
Annapolis, Maryland 21401

**HB 806: Autonomous Vehicle Converters – Sale of Autonomous Vehicles
Position: Favorable with Amendments**

Dear Chair Barve:

On behalf of the Alliance for Automotive Innovation (Auto Innovators), we are writing to express our position on HB 806 and request an amendment to clarify liability requirements for manufacturers.

From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle (AV) innovators to equipment suppliers, battery producers and semiconductor makers – the Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy.

As a global leader in the development of AV technologies, the U.S. is at the forefront of innovations that will transform transportation in a number of ways. Safety, of course, is a critical component in the development of AVs. Another benefit of these vehicles is the promise to provide life-changing opportunities for those who are not adequately served by existing mobility options, such as seniors, persons with disabilities, and those who require more affordable transportation.

While we appreciate the intent of HB 806, the bill is missing liability protections for vehicle manufacturers. As the bill defines them, AV converters fundamentally alter the original manufacturer’s product by “addition, substitution, or removal of components”. Manufacturers certify that their vehicles comply with federal motor vehicle safety standards. When fundamental vehicle components are added, substituted, or removed by a third-party the liability for those changes should rest with the third-party responsible for those changes. To clarify this issue, we have provided language which we think addresses this concern.

Proposed Amendment Language

“The manufacturer of a vehicle converted by an autonomous vehicle converter into an converted autonomous vehicle is not liable in, and shall have a defense to and be dismissed from, any legal action brought against the manufacturer by any person injured due to an alleged vehicle defect caused by the autonomous vehicle converter's conversion of the vehicle, or by equipment installed by the autonomous vehicle converter, unless the alleged defect was present in the vehicle as originally manufactured.”

Thank you for your consideration of the Auto Innovators’ position. For more information, please contact our local representative, Bill Kress, at (410) 375-8548.

Sincerely,



Josh Fisher
Director, State Affairs

HB0806 - MVA - Sale of Autonomous Vehicles - LOI_F

Uploaded by: Patricia Westervelt

Position: INFO

February 23, 2023

The Honorable Kumar P. Barve
Chair, House Environment and Transportation Committee
Room 251, House Office Building
Annapolis MD 21401

***RE: Letter of Information – House Bill 806 – Vehicle Laws – Autonomous Vehicle
Converters – Sale of Autonomous Vehicles***

Dear Chair Barve and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on House Bill 806 but offers the following information for the Committee’s consideration.

House Bill 806 authorizes an autonomous vehicle converter to purchase motor vehicles directly from a manufacturer, outfit them with autonomous vehicle technology, and then lease or sell to commercial or industrial buyers in other states. House Bill 806 further exempts such companies from obtaining dealership licenses required under State law.

The MDOT Motor Vehicle Administration (MVA) would like to note for the Committee that it has engaged in conversations with the bill sponsor. The MVA has no objections to permitting a Maryland business from utilizing a business model that purchases new vehicles to have third-party hardware and software added before reselling the upgraded vehicle to out of state commercial and industrial buyers.

For the Committee’s awareness, the MVA is not aware of any national companies that are utilizing this business model and so notes that such regulation proposed by House Bill 806 is limited to very specific circumstances. The current manufacturer and dealer laws in Maryland – and across the country – were not crafted to anticipate this type of business model and as the automotive industry evolves into areas that will impact both general public consumers, commercial and industrial consumers, and public safety, there may be a need for additional statutory and regulatory oversight in the future.

The Maryland Department of Transportation respectfully requests that the Committee consider this information when deliberating House Bill 806.

Respectfully submitted,

Christine E. Nizer
Administrator
Maryland Motor Vehicle Administration
410-787-7830

Pilar Helm
Director of Government Affairs
Maryland Department of Transportation
410-865-1090