



**Auto Consumer Alliance**  
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**Testimony to the House Environment and Transportation Committee  
HB 1447 – Motor Vehicles – Autonomous Vehicles –  
Standards, Requirements and Prohibited Acts  
Position: UNFAVORABLE**

The Honorable Mark Korman  
Environment and Transportation Committee  
Room 251, House Office Building  
Annapolis, MD 21401

March 7, 2024

cc: Members, Environment and Transportation Committee

**Honorable Chair Korman and Members of the Committee:**

I'm a consumer advocate and Executive Director of Consumer Auto, a nonprofit group that works to protect Maryland consumers and secure safety, transparency, and fair treatment for Maryland drivers and car buyers.

We oppose **HB 1447** because it would put Marylanders at unnecessary risk by authorizing the private use of autonomous vehicles on Maryland highways – at a time when that technology is really not safe, not properly regulated, and not ready for public roads. While the bill would require, among other stipulations, that AVs on MD roads meet federal safety regulations, that offers little reason to be confident they will be safe – as federal regulators are yet to establish clear or rigorous safety standards – or really any meaningful safety standards – for this nascent technology.

Indeed, in May 2023, Jennifer Homendy, the chair of the National Transportation Safety Board lamented that, “The federal government isn’t doing their job in that area... The NTSB has called on regulators to set performance minimums for these features [AVs], to test vehicles rigorously against those standards and provide the results to consumers. But we’re still waiting.”<sup>1</sup> At this point, regulators are still working to establish standards for collecting and comparing data needed to assess if AVs operate safely<sup>2</sup>; meaningful federal safety standards are still a distant hope.

At the same time, many recent uses of this kind of technology have only added to safety concerns. In December, Tesla announced a recall of more than 2 million cars equipped with its now-infamous “Autopilot” driver-assistance system after at least 17 fatalities and more than 700 crashes involving the system had been reported since 2019.<sup>3</sup> Even after it conducted an over-the-air update to the system, safety advocates who’ve reviewed how the cars now work do not believe it operates safely.<sup>4</sup> While “Autopilot” isn’t a true AV system (despite its misleading name), the system allows many drivers to use it as if it were – and the results have often been tragic.

In California, several companies have been operating AV robotaxis on the streets of some cities – and the results have been deeply troubling. GM-owned Cruise lost its permit to operate in the wake

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<sup>1</sup> <https://www.cnn.com/2023/05/06/business/ntsb-automatic-driving-safety/index.html>

<sup>2</sup> <https://www.nts.gov/news/press-releases/Pages/NR20220615.aspx>

<sup>3</sup> <https://www.nts.gov/news/press-releases/Pages/NR20220615.aspx>

<sup>4</sup> <https://www.washingtonpost.com/technology/2023/12/31/tesla-autopilot-recall-test/>



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of a gruesome accident in October in which one of its robotaxis hit a pedestrian and, after a pause, kept moving, dragging the woman 20 feet or more and leaving her hospitalized.<sup>5</sup> Waymo continues to operate in the Bay Area despite extensive controversy about streets blocked by AVs that stop in the roads and can't readily be moved, often causing traffic gridlock, blocking emergency vehicles, and prompting anger from citizens and fire officials alike. On Chinese New Year in February, one stalled Waymo in Chinatown was even torched by an angry crowd.<sup>6</sup>

In light of such problems, it's not surprising that 68% of Americans told AAA last year that they are outright afraid of self-driving vehicles (up from 55% in 2022) while just 9% said they trusted the technology.<sup>7</sup>

To this point, Maryland has properly moved slowly on this unproven technology. While MDOT has articulated a "Vision for Connected and Automated Vehicles" and the state passed legislation last year that authorizes limited conversions of vehicles into AVs, mostly for off-road commercial and industrial uses (SB 685), the state has not acted to authorize widespread private use of AVs on public roads.

**HB 1447** would change that equation by allowing someone to operate "a fully autonomous vehicle with the automated driving system engaged" on a MD highway. The bill's safety provisions are fairly modest – requiring that the person have a driver's license, is seated in the front seat (it doesn't even require it to be the driver's seat), that the vehicle complies with state regulations and federal safety standards, and be driven for personal (not commercial) use.

Unfortunately, those stipulations offer little assurance of safety. As noted above, no system of federal regulations to ensure AV safety yet exists. And experience with driver-assistance systems like Autopilot (which asks drivers to be seated in the driver's seat and attentive) has shown that having a semi-engaged back-up driver in the front seat does little to improve safety – because that person is unlikely to be able to respond quickly enough to respond to a serious safety issue.

Until or unless we have clear data that shows AVs are safe and a regulatory framework in place to help us make sure they operate responsibly, Maryland need not and should not allow an unlimited number of such vehicles on our roads. Moving to allow their widespread use before we have either of those safeguards in place -- as **HB 1447** would do – would, I fear, expose Maryland drivers to serious and unnecessary risks.

**We oppose HB 1447 and ask you to give it an UNFAVORABLE report.**

Sincerely,  
Franz Schneiderman  
Consumer Auto

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<sup>5</sup> <https://www.latimes.com/business/story/2023-10-26/cruise-robotaxi-dragged-injured-woman-misled-reporters>

<sup>6</sup> <https://www.reuters.com/business/autos-transportation/san-francisco-waymo-arson-sparks-fresh-debate-self-driving-cars-2024-02-13/>

<sup>7</sup> <https://info.oregon.aaa.com/aaa-fear-of-self-driving-cars-on-the-rise/>