

Testimony of
American Property Casualty Insurance Association (APCIA)
House Environment & Transportation Committee
House Bill 1447- Autonomous Vehicles - Standards, Requirements, and Prohibited Acts
March 7, 2024

Support with Amendments

The American Property Casualty Insurance Association (APCIA) is a national trade organization whose members write approximately 55.2.% of the personal auto insurance market and 75.7% of the commercial auto insurance market in Maryland. We appreciate the opportunity to provide written comments on House Bill 1447.

House bill 1447 allows the operation on Maryland roads of “fully autonomous” vehicles, capable of performing the entire driving operation, but must have a licensed driver in the front seat, and all state and federal vehicle requirements are met. Notably, it prohibits transporting passengers for commercial purposes. As for insurance, it references the FR minimums. And it leaves the rest up to the department to adopt regulations.

APCIA is concerned as the bill does not address contain a separate and distinct insurance requirement for the manufacture of the automated driving system, who will increasingly be brought into claims involving automated driving system equipped car. Because product liability issues are likely to become more common in auto accident claims handling, it is also appropriate to require manufacturers to prove financial responsibility to state transportation regulators, prior to testing or deployment of vehicles with automated driving systems.

APCIA suggests the following amendment language for the Committee’s consideration:

One line 9 after ARTICLE delete AND

On line 11 on page 3 after ARTICLE delete (.) and insert ; AND

\$5,000,000 GENERAL LIABILITY INSURANCE REQUIREMENT INCLUDING PRODUCT LIABILITY PROVIDED BY THE MANUFACTURERS OF THE AUTOMATED DRIVING SYSTEM.

With these amendments, APCIA urges the Committee to provide a favorable report on House Bill 1447.

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