March 6, 2020

The Honorable Kumar Barve
Chairman, House Environment and Transportation Committee
251 House Office Building
Annapolis MD 21401

Re: Letter of Information – House Bill 1483 – Vehicle Laws – Personal Delivery Devices – Standards and Requirements

Dear Chairman Barve and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on House Bill 1483 but offers the following information for the Committee's consideration.

House Bill 1483 establishes exceptions to motor vehicle registration requirements for personal delivery devices and authorizes personal delivery devices to operate on sidewalks, crosswalks, and highways. The bill establishes a standard whereby a personal delivery device may navigate with or without the active control or monitoring of an individual, may weigh up to 200 lbs. excluding cargo, and may travel up to 3.5 miles per hour on a sidewalk or crosswalk.

Since 2015, MDOT has supported a robust Connected and Automated Vehicle (CAV) Working Group which serves as the central point of coordination for the development and deployment of emerging CAV technologies in Maryland. Maryland's CAV Working Group has a broad cross section of stakeholders, including elected officials, representatives from state and local government, highway safety organizations, private sector, automotive industry and other transportation stakeholders. This group evaluates the latest research, including guidance from the American Association of Motor Vehicle Administrators (AAMVA), the U.S. Department of Transportation, tracks federal and state actions, and coordinates with all interested stakeholders. This collaborative program is setting a course for the future of automated and connected vehicles in Maryland which prioritizes the safety for all roadway users.

The MDOT, through the CAV Working Group, facilitates a permit process for parties interested in testing highly automated vehicles (HAV), and has designated a number of sites, owned by MDOT and its partners, for the testing of connected and automated vehicle technologies. Through the HAV permit process, applicants work collaboratively with MDOT to ensure project objectives are met while prioritizing safety in testing.

The MDOT monitors emerging and innovative technologies such as personal delivery devices (PDDs) to adapt to, and take advantage of, technologies reshaping mobility choices. PDDs have emerged as an innovative technology promising to improve the efficiency of deliveries. The impact on the transportation sector is currently not well-understood.

There are several technical aspects to implementing House Bill 1483 that remain unresolved. Namely, there are no identified roadway prohibitions, it is unclear how a unique identifying number would be assigned, there is no defined process for regulating the approval of devices, there are no standards for device hardware or software (including the lighting requirements), and the method for monitoring insurance compliance is unclear.

Several states now allow PDDs in public spaces (WA, AZ, FL, etc.), although regulations are not uniform across these states. As this technology proliferates, several areas of uncertainty remain that all communities across the country will have to consider. The impact to children, seniors, and individuals with disabilities navigating walkways will be impacted by these devices. While the legislation states that a PDD is to be used primarily on sidewalks, there is no guarantee that a PDD in a crosswalk will have the ability to determine how long it has to cross the highway, whereas a pedestrian is cued by audio and visual signals at signalized crossings. The ability of PDDs to adjust to crowded environments is currently inconsistent, and safeguards and safety controls for these devices are still evolving. Land use concerns such as the management of curb access will need to be considered as PDDs begin to appear more frequently in Maryland communities.

MDOT is embracing CAV technology and working collaboratively with many partners to ensure that Marylanders benefit from a transportation system which fully realizes the many positive potential outcomes of CAV technology, while also ensuring the safety of all roadway users. Maryland has been intensely proactive in its approach to advancements in CAV technology by ensuring that developments in the state are in line with federal legal and regulatory frameworks and reflect best practices and guidance from expertise around the country and the world.

The Maryland Department of Transportation respectfully requests the Committee consider this information when deliberating House Bill 1483.

Respectfully submitted,

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

Jeff Tosi
Director of Government Affairs
Maryland Department of Transportation
410-841-2850