

Integral Components SB 685[1].pdf

Uploaded by: Ashlie Bagwell

Position: FAV



February 27, 2023

Hon. Senator Will Smith, Chairman
Hon. Senator Jeff Waldstreicher, Vice Chairman
Senate Judicial Proceedings Committee, Room 2 East
Miller Senate Office Building, Annapolis, MD 21401

Re: SB 685 – Vehicle Laws—Autonomous Vehicle Converters—Sale of Autonomous Vehicles

Hearing Date: March 2, 2023

Position: Favorable

Dear Chairman Smith, Vice Chairman Waldstreicher, and Committee Members:

Integral Components, Inc is a cable assembly and antenna manufacturer based in Westminster, Maryland. We design and manufacture a wide range of cable assemblies, wire harnesses, and antennas, which are critical components in any automated driving systems. We currently have nearly 40 employees and work with many defense and commercial companies.

As a supplier of critical components and services used in automated driving systems, we strongly support SB 685. As this technology advances, we believe that our business will also grow. For this reason, we hope that the committee will vote to advance this legislation.

Sincerely,

/s/ William L. Keiser

William L. Keiser, President
Integral Components, Inc.

Senator Jeff Waldstreicher Testimony - SB 685 - Au

Uploaded by: Jeff Waldstreicher

Position: FAV

SENATOR JEFF WALDSTREICHER
Legislative District 18
Montgomery County

Vice Chair
Judicial Proceedings Committee

Joint Committee on Federal Relations



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The Senate of Maryland
ANNAPOLIS, MARYLAND 21401

Testimony of Senator Jeff Waldstreicher
Senate Bill 685 – Vehicle Laws – Autonomous Vehicle Converters – Sale of Autonomous Vehicles

March 2, 2023

Chairman Smith and Members of the Judicial Proceedings Committee:

All over the country, entrepreneurs and innovators are developing the autonomous vehicles of the future. As you probably know, these autonomous vehicles—also known as self-driving vehicles—are capable of traveling without human input. One company on the cutting-edge of this technology is RRAI, located right here in Maryland.

RRAI has delivered autonomous mobility and robotics solutions for more than two decades. In fact, they were the first DOD-approved company to deploy unmanned vehicles. Here in Maryland, technology companies like RRAI buy vehicles, integrate their autonomous technology, and then sell these vehicles to their commercial and industrial customers.

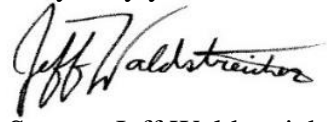
Now, companies like Maryland’s RRAI are a little different than Tesla, or GM, or Ford. Those companies *manufacture* autonomous vehicles. But vendors like the U.S. military often don’t want to lock themselves into particular manufacturers. They want to be manufacturer-neutral, and instead add autonomous capabilities to existing, trusted vehicles. That’s exactly what companies like RRAI do. They buy off-the-shelf vehicles, make those vehicles autonomous, then sell those vehicles to the military, ports, or other government agencies.

Here’s the problem: potentially, this means that they are technically auto dealers. Which of course they are not.

Specifically, Maryland law stipulates that selling three or more vehicles in a calendar year requires a vehicle dealer’s license. Senate Bill 685 would codify the definition of “autonomous vehicle converter” and exempt these technology companies from our vehicle dealer statute. Notably, this bill is narrowly tailored to eliminate the possibility of unintended consequences. Regular passenger vehicles are not covered, and the vehicles sold must exceed weight and capacity thresholds established under federal law.

Senate Bill 685 is simple legislation that provides innovative Maryland companies like RRAI the ability to scale up and grow. These companies never intended to be auto dealers, and this bill clarifies that. I respectfully request a favorable report.

Very truly yours,

A handwritten signature in black ink, reading "Jeff Waldstreicher". The signature is written in a cursive style with a large, stylized "J" and "W".

Senator Jeff Waldstreicher

SB 685_Autonomous Vehicles_Support.pdf

Uploaded by: Kevin Anderson

Position: FAV



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

DATE: March 2, 2023
BILL NO: Senate Bill 685
BILL TITLE: Vehicle Laws – Autonomous Vehicle Converters – Sale of Autonomous Vehicles
COMMITTEE: Judicial Proceedings
POSITION: Support

The Maryland Department of Commerce (Commerce) supports Senate Bill 685- Vehicle Laws – Autonomous Vehicle Converters – Sale of Autonomous Vehicles.

Background:

Senate Bill 685 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. Senate Bill 685 will give Maryland a competitive advantage for retaining and attracting future autonomous vehicle manufacturers.

Commerce respectfully requests a favorable report on Senate Bill 685.

Ext. Comm. - Testimony - 2023 - Maryland SB 685 -

Uploaded by: Joshua Fisher

Position: FWA



March 1, 2023

The Honorable William C. Smith, Jr.
Chair, Senate Judicial Proceedings Committee
Senate Office Building
Annapolis, Maryland 21401

**SB 685: Autonomous Vehicle Converters – Sale of Autonomous Vehicles
Position: Favorable with Amendments**

Dear Chair Smith:

On behalf of the Alliance for Automotive Innovation (Auto Innovators), we are writing to express our position on SB 685 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 SB 685, 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
Senior Director, State Affairs

SB0685 - MVA - Sale of Autonomous Vehicles - LOI_F

Uploaded by: Patricia Westervelt

Position: INFO

March 2, 2023

The Honorable William C. Smith, Jr.
Chair, Senate Judicial Proceedings Committee
2 East, Miller Senate Office Building
Annapolis MD 21401

RE: Letter of Information – Senate Bill 685 – Vehicle Laws – Autonomous Vehicle Converters – Sale of Autonomous Vehicles

Dear Chair Smith and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on Senate Bill 685 but offers the following information for the Committee’s consideration.

Senate Bill 685 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. Senate Bill 685 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 Senate Bill 685 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 Senate Bill 685.

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