February 14, 2025

The Honorable C. T. Wilson
Chair, House Economic Matters Committee
House Office Building
Annapolis, Maryland 21401

RE: HB 823 – Generative Artificial Intelligence – Training Data Transparency
Position: Informational

Dear Chair Wilson:

On behalf of the Alliance for Automotive Innovation (Auto Innovators)[1], I am writing to provide the auto industry's perspective on HB 823. The automotive industry shares your goal of promoting transparency and trust in artificial intelligence technologies.

Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing approximately 5 percent of the country's GDP, responsible for supporting 10 million jobs, and driving $1.2 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector. **Our members provided over $200 billion of economic activity over the last decade through their use of the Port of Baltimore.**

The automotive industry leverages the power of artificial intelligence to integrate driver support features, advanced safety technologies, and automated driving systems into consumer vehicles. For example, artificial intelligence helps vehicle safety systems understand camera and sensor data, which enables safety features like emergency braking. These and other technological advances have the potential to improve roadway safety, increase traffic efficiency, reduce serious injuries and deaths, and help protect all road users. For these reasons, the automotive industry supports policies that seek to cultivate public trust in the use of artificial intelligence technologies that can support advances in transportation safety.

Given the myriad ways that motor vehicles incorporate artificial intelligence technologies, including generative artificial intelligence, **we respectfully requests an addition to §3.5-807 (B) that would exclude generative artificial intelligence systems that are exclusively made for "the improvement,**

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[1] From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – Auto Innovators represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. https://www.autosinnovate.org/

maintenance, repair, and operation of motor vehicles." Increased compliance obligations on the use of artificial intelligence technologies could prevent automotive companies from improving existing vehicle systems or developing new safety features. Automotive companies have multi-year design and manufacturing cycles, and there are significant capital investments necessary to bring new products to market. Any additional compliance requirements regarding disclosures on training data for generative artificial intelligence would need to be incorporated into automotive companies' development timelines. Furthermore, the National Highway Traffic Safety Administration is the appropriate authority to regulate vehicles and vehicle systems using generative artificial intelligence as the agency currently establishes, monitors, and enforces vehicle safety regulations.

Cultivating public trust and transparency in the use of artificial intelligence systems remains critically important to Alliance for Automotive Innovation and its member companies. We appreciate the opportunity to provide this feedback and input and look forward to continuing to work with you on this important topic.

Thank you in advance for your consideration of our views. For more information, please contact our local representative, Bill Kress, at (410) 375-8548.

Respectfully submitted,

Josh Fisher
Senior Director, State Government Affairs
Alliance for Automotive Innovation