
February 27, 2025

The Honorable Marc Korman
Chair, Environment and Transportation Committee
251 House Office Building
Annapolis, MD 21401

RE: Letter of Information – House Bill 1256 – Vehicle Laws - Fully Autonomous Vehicles

Dear Chair Korman and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on House Bill 1256 but offers the following information for the Committee’s consideration.

House Bill (HB) 1256 establishes a statutory framework for the operation of fully autonomous vehicles (AVs) on Maryland roadways. The MDOT recognizes that, if implemented appropriately, AVs provide an opportunity to improve safety on the roadways and transportation accessibility. As of 2024, 24 states have expressly authorized deployment of autonomous vehicles with approaches similar to this bill.

The Motor Vehicle Administration (MVA) has taken a lead role in guiding the development of Connected and Autonomous Vehicle (CAV) policy in Maryland. The MVA has chaired the CAV working group since 2015 to bring together all interested parties to work together on the issue, including industry, first responders, safety advocates, and government; this stakeholder approach has been recognized as a successful model across the country. While the MVA has issued a number of testing permits to entities to test CAVs in Maryland, there are currently no active testing permits in Maryland.

The framework for HB 1256 would expressly authorize the use of AVs within their designated operational design domain. The vehicle would be considered the driver of the vehicle, and there would be no need for human driving intervention. The vehicle’s liability limits would apply, and the vehicle owner would be liable for its operation. In short, with this legislation, AVs would essentially be treated as any other vehicle on the road, except that the vehicle could not be subject to citation for laws naturally applying to only “human” behavior, such as impaired and distracted driving.

The MVA’s role would be to issue a distinctive registration and to collect and disseminate information on the registered AV to first responders. It would require a new process for registering these vehicles, though the MVA system can record the level of autonomy for a vehicle. The MVA is familiar with dissemination of first responder plans through the current testing permit process.

The Honorable Marc Korman
Page Two

The MVA is in discussion with the bill sponsor to include an amendment to authorize the Administration to suspend the registration of an AV if the vehicle presents safety concerns similar to how the California Department of Motor Vehicles was able to quickly suspend permits issued to Cruise when a vehicle struck a pedestrian in San Francisco in 2023. This legislation will need to give sufficient authority to MVA to ensure that the Administration can secure the safety of Maryland's roadways.

For these reasons, the Maryland Department of Transportation respectfully requests that the Committee consider this information when deliberating House Bill 1256.

Respectfully submitted,

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

Matthew Mickler
Director of Government Affairs
Maryland Department of Transportation
410-865-1090