January 31, 2025

Delegate Marc Korman
Chair, House Environment and Transportation Committee
251 Taylor House Office Building
6 Bladen Street
Annapolis, MD 21401

Dear Chair Korman and members of the House Environment and Transportation Committee,

The Autonomous Vehicle Industry Association ("AVIA") writes to express our strong opposition to HB 439, which would effectively ban fully autonomous AV trucking operations in Maryland by authorizing a person to operate an AV only if the person is seated in the front seat of the vehicle while the AV. A regulatory framework that supports the full deployment of AVs will better equip Maryland's transportation system, environment, and workforce to take advantage of the benefits presented by this technology. Unfortunately, HB 439 jeopardizes this future.

By way of background, AVIA is comprised of the world's leading technology, ridesharing, trucking, and automotive companies. Our mission is to realize the benefits of autonomous vehicles (i.e., SAE Levels 4- and 5-capable vehicles equipped with automated driving systems that are capable of driving the vehicle without human intervention) and support the safe and expeditious deployment of these technologies. With its broad array of technical expertise and experience in the technology, automobile, and transportation network sectors, AVIA appreciates the opportunity to engage with the Committee to develop the right solutions that will promote the safe deployment of AVs on Maryland roads.

AVs have tremendous safety, mobility, and efficiency benefits, and the ongoing deployment of AVs is demonstrating how AVs will save lives and change the way we move. Maryland saw 600 traffic fatalities in 2023—the most in nearly 20 years. These fatality numbers reveal a pattern of increasingly unsafe driving that is occurring in Maryland and they reflect an unacceptable status quo when it comes to safety on our roadways.

Human behavior is a contributing factor to the overwhelming majority of crashes. AVs are well positioned to combat the trend of unsafe driving that has persisted for years on U.S. roads because they have unparalleled visibility of the world around them as a result of advanced technologies that work in concert to form the automated driving system, which is the "brain" that drives the vehicle. The combination of these systems leads to quicker decisions with many more

inputs than a human driver. AVs also have a 360-degree field of vision which can detect, track, and react to objects and people even when they are hidden from human perception due to vehicles, buildings, and other obstructions. Importantly, unlike human drivers, AVs do not drive drunk, text while driving, fall asleep at the wheel, or recklessly speed.

Moreover, AVs have built a significant safety record through more than a dozen years of development and deployment, and vehicles operated by AVIA members have driven more than 70 million autonomous miles on public roads in the U.S. alone–equivalent to more than 293 trips to the moon. This safety record is supported by data collected by the federal government, which requires AV companies to report incidents—no matter how minor or who caused the incident—that occur while an automated driving system is engaged. Furthermore, as the industry reaches miles-driven milestones, companies are releasing compelling safety studies to show how the vehicles are making roads safer. Autonomous vehicles are safely operating without human drivers across the country.

In addition to enhancing safety, the full deployment of AVs will create new jobs for Maryland workers. The AV industry is currently leveraging the existing workforce to create new roles for different education and skill levels. Many of the jobs created will not require a college degree, such as service technicians, remote assistance operators, mapping data collectors, delivery packers, and many others to support AV operations. Workers with experience in the trucking industry specifically, particularly as truck drivers, offer valuable skills to AV trucking employers. Make no mistake: America's truck drivers and autonomous trucks will coexist and thrive together in the future. Federal government data shows our country must move 50% more freight by 2050. Unfortunately, the U.S. trucking industry is currently short of nearly 80,000 truck drivers due to a long-term decline in new drivers entering the profession, and an annual turnover rate exceeding 90%. If current trends continue, the shortage is set to double by 2031. Maryland must find ways to move *more* freight with *fewer* truck drivers to do it. We believe autonomous trucks are one part of the suite of solutions and that autonomous trucks will augment the important work that truck drivers do for our country. Imposing a human driver requirement would only further exacerbate the driver shortage crisis and its resulting impacts on our supply chain.

In addition to offering these safety and mobility benefits, AVs can also help reduce traffic congestion, improve environmental quality, and advance transportation efficiency. In particular, autonomous heavy-duty vehicles that operate in interstate commerce will increase the safety and efficiency of freight movement. According to a study funded by the U.S. Department of Transportation and Federal Highway Administration, automating long-haul trucking will spur

$111 billion in aggregate investment spending across the U.S. economy, increase total U.S. employment by 26,400 to 35,100 jobs per year on average, and raise annual earnings for all U.S. workers by more than $200 per worker per year.

AVs offer great opportunities, but a framework that allows for the driverless deployment of the technology is necessary to realize these benefits. If Maryland chooses to take legislative or regulatory action with respect to AVs, such action should be premised on removing impediments to the safe testing and deployment of such vehicles, and creating a pro-competitive and level playing field. However, HB 439 would discourage AV operations in the state. Requiring a human observer to remain in an AV truck would deviate from the overwhelming majority of states' approaches to AV regulation. Additionally, the bill requires companies to submit incident reports with details for each disengagement. Similar legislation that was vetoed in California last year estimated a cost of $16 million to implement in the first year, $7.6 million in the second year and $4.4 million annually thereafter to adopt regulations, develop, build and maintain a new IT system to evaluate data that does not contribute meaningfully to safety. Furthermore, if Maryland were to move forward with HB 439, it would become a national outlier and would forestall AV investment, development, and operations in the state.

Autonomous vehicles will usher in a new era of mobility that will make Maryland's transportation system safer, more efficient, and more accessible. We strongly believe Maryland should support safety-enhancing policies without foreclosing a future with AVs. For the reasons described above, we respectfully strongly oppose HB 439.

Sincerely,

Jeff Farrah
Chief Executive Officer
Autonomous Vehicle Industry Association