

March 5, 2025

The Honorable Will Smith  
Chair, Senate Judicial Proceedings Committee  
3 Miller Senate Office Building  
Annapolis, MD 21401

***RE: Letter of Information – Senate Bill 949 – Vehicle Laws - Fully Autonomous Vehicles***

Dear Chair Smith and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on Senate Bill 949 but offers the following information for the Committee's consideration.

SB 949 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 SB 949 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 Will Smith  
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 Senate Bill 949.

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