

TO: The Honorable Marc Korman, Chair
Members, House Environment and Transportation Committee
Delegate Natalie Ziegler

FROM: Richard A. Tabuteau

DATE: March 5, 2026

RE: **FAVORABLE WITH AMENDMENTS:** House Bill 1295 – *Vehicle Laws - Fully Autonomous Vehicles*

In Maryland, Volvo Group North America's Hagerstown Powertrain Production facility employs nearly 2,000 people including over 1,400 members of the UAW Locals 171 and 1247 and is the last major automotive manufacturer in Maryland. The plant develops, manufactures, and tests heavy-duty powertrains, transmissions and axles for its Mack and Volvo trucks as well as Prevost and Volvo buses at its 280-acre campus. Volvo Group also employs more than 60 people at one of its U.S. parts distribution facilities in Elkridge.

Volvo has manufactured commercial vehicles in the United States for decades and is advancing autonomous freight applications through Volvo Autonomous Solutions with a focus on safety and disciplined deployment.

The attached amendments to House Bill 1295 provide three essential elements.

First, legal clarity — explicitly authorizing fully autonomous vehicles to operate without a human driver and recognizing the automated driving system as the legal operator when engaged.

Second, practical safety guardrails — including a minimal risk condition requirement, federal safety certification, crash reporting compliance, and a first responder interaction plan.

Third, statewide consistency — ensuring a predictable regulatory framework without a patchwork of local restrictions.

The bill also maintains strong financial responsibility standards, including a \$1 million insurance requirement when the automated driving system is engaged.

Clear, balanced frameworks like this enable responsible innovation while protecting public safety. For these reasons, Volvo respectfully urges a favorable report on House Bill 1295 as amended.

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17 14-4702.

18 This subtitle applies to a person that [conducts]:

19 (1) CONDUCTS business in the State or provides products or services that
20 are targeted to residents of the State, and that during the preceding calendar year did any
21 of the following:

22 [(1)] (I) Controlled or processed the personal data of at least 35,000
23 consumers, excluding personal data controlled or processed solely for the purpose of
24 completing a payment transaction; or

25 [(2)] (II) Controlled or processed the personal data of at least 10,000
26 consumers and derived more than 20% of its gross revenue from the sale of personal data;
27 ~~OR~~

~~28 (2) COLLECTS PERSONAL DATA THROUGH THE USE OR OPERATION
29 OF A FULLY AUTONOMOUS VEHICLE, AS DEFINED UNDER § 21-1501 OF THE
30 27 TRANSPORTATION ARTICLE.~~

1 SUBTITLE 15. FULLY AUTONOMOUS VEHICLES.

1 21-1502.

2 (A) A PERSON MAY OPERATE A FULLY AUTONOMOUS VEHICLE ON A
3 HIGHWAY IN THE STATE WITHOUT A HUMAN DRIVER AND WITH THE AUTOMATED
4 DRIVING SYSTEM ENGAGED IF THE VEHICLE MEETS THE FOLLOWING CONDITIONS:

5 (1) IF A FAILURE OF THE AUTOMATED DRIVING SYSTEM OCCURS
6 THAT RENDERS THE SYSTEM UNABLE TO PERFORM THE ENTIRE DYNAMIC DRIVING
7 TASK RELEVANT TO ITS INTENDED OPERATIONAL DESIGN DOMAIN, THE FULLY
8 AUTONOMOUS VEHICLE WILL ACHIEVE A MINIMAL RISK CONDITION;

9 (2) THE FULLY AUTONOMOUS VEHICLE IS CAPABLE OF OPERATING
IN

10 ACCORDANCE WITH THE MARYLAND VEHICLE LAW, UNLESS THE ADMINISTRATION
11 HAS ADOPTED A REGULATION EXEMPTING AUTONOMOUS VEHICLES FROM SPECIFIC
12 PROVISIONS OF LAW; AND

13 (3) THE FULLY AUTONOMOUS VEHICLE DISPLAYS THE REQUIRED
1 MANUFACTURER'S CERTIFICATION LABEL INDICATING THAT THE VEHICLE IS IN

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2 COMPLIANCE WITH ALL APPLICABLE FEDERAL MOTOR VEHICLE SAFETY
3 STANDARDS, INCLUDING REFERENCE TO ANY EXEMPTION GRANTED BY THE
4 NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION.

5 (B) (1) BEFORE OPERATING A FULLY AUTONOMOUS VEHICLE ON A
6 HIGHWAY IN THE STATE WITHOUT A HUMAN DRIVER AND WITH THE AUTOMATED
7 ~~DRIVING SYSTEM ENGAGED, A PERSON RESPONSIBLE FOR OPERATING THE~~
8 ~~VEHICLE~~
9 ~~OR THE MANUFACTURER OF EITHER THE VEHICLE OR THE VEHICLE'S AUTOMATED~~
10 ~~DRIVING SYSTEM~~ SHALL SUBMIT A FIRST RESPONDER INTERACTION PLAN TO THE
11 ADMINISTRATION.

12 (2) A FIRST RESPONDER INTERACTION PLAN SHALL CONTAIN
13 INFORMATION ON:

14 (i) HOW TO COMMUNICATE WITH A FLEET SUPPORT
15 SPECIALIST WHO IS AVAILABLE DURING THE TIMES THE FULLY AUTONOMOUS
16 VEHICLE IS IN OPERATION;

17 (ii) HOW TO SAFELY REMOVE THE FULLY AUTONOMOUS
18 VEHICLE FROM THE HIGHWAY AND STEPS TO PROPERLY TOW THE VEHICLE;

19 (iii) HOW TO RECOGNIZE WHETHER THE FULLY AUTONOMOUS
20 VEHICLE IS OPERATING AUTONOMOUSLY; AND

21 (iv) ANY OTHER INFORMATION THAT THE MANUFACTURER,
22 OWNER, OR ADMINISTRATION CONSIDERS NECESSARY, INCLUDING INFORMATION
23 REGARDING HAZARDOUS CONDITIONS OR PUBLIC SAFETY RISKS ASSOCIATED WITH
24 THE OPERATION OF A FULLY AUTONOMOUS VEHICLE.

25 (C) A PERSON SHALL SUBMIT EVIDENCE TO THE ADMINISTRATION, IN THE
26 MANNER REQUIRED BY THE ADMINISTRATION, CERTIFYING THAT ALL SECURITY
27 REQUIRED UNDER § 21-1509 OF THIS SUBTITLE IS IN EFFECT BEFORE OPERATING
28 A FULLY AUTONOMOUS VEHICLE WITHOUT A HUMAN DRIVER.

29 (D) WHEN A ~~FULLY AUTONOMOUS~~ VEHICLE ~~EQUIPPED WITH AN~~
30 ~~AUTOMATED DRIVING SYSTEM~~ IS OPERATING WITH THE
31 AUTOMATED DRIVING SYSTEM ENGAGED, THE AUTOMATED DRIVING SYSTEM IS
32 CONSIDERED TO:

33 (1) BE THE VEHICLE OPERATOR FOR DETERMINING COMPLIANCE

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~~§230~~ WITH THE MARYLAND VEHICLE LAW;

2 (2) SATISFY ELECTRONICALLY ALL PHYSICAL ACTS REQUIRED BY A
2 VEHICLE DRIVER; AND

3 (3) BE LICENSED TO OPERATE THE VEHICLE.

4 (E) A HUMAN DRIVER MAY OPERATE A FULLY AUTONOMOUS VEHICLE THAT
5 IS DESIGNED TO ALLOW HUMAN OPERATION IF THE AUTOMATED DRIVING SYSTEM
6 IS
6 NOT ENGAGED.

7 (F) (1) IN THE EVENT OF A VEHICLE CRASH INVOLVING A FULLY
8 AUTONOMOUS VEHICLE, THE FULLY AUTONOMOUS VEHICLE OR THE PERSON
9 OPERATING THE FULLY AUTONOMOUS VEHICLE SHALL COMPLY WITH THE
10 REQUIREMENTS UNDER TITLE 20 OF THIS ARTICLE.

11 (2) ALL NOTICE AND REPORTING REQUIREMENTS UNDER TITLE 20
12 OF THIS ARTICLE SHALL BE SATISFIED WITHIN 15 DAYS AFTER A VEHICLE CRASH
13 INVOLVING A FULLY AUTONOMOUS VEHICLE, UNLESS AN EXTENSION IS GRANTED
14 UNDER TITLE 20 OF THIS ARTICLE.

15 21-1503.

16 (A) SUBJECT TO SUBSECTIONS (B) AND (C) OF THIS SECTION, A
17 TRANSPORTATION NETWORK COMPANY, FOR-HIRE VEHICLE COMPANY, OR OTHER
18 GROUND PASSENGER TRANSPORTATION COMPANY MAY USE FULLY AUTONOMOUS
19 VEHICLES, PROVIDED THAT ANY SUCH FULLY AUTONOMOUS VEHICLES THAT ARE
EQUIPPED WITH A USER INTERFACE SHALL ENABLE INDIVIDUALS WITH
DISABILITIES TO INDEPENDENTLY ACCESS ALL RELEVANT ASPECTS AND USER
FEATURES OF THE INTERFACE.

20 (B) (1) ANY PROVISION OF THE MARYLAND VEHICLE LAW THAT BY ITS
21 NATURE APPLIES ONLY TO A HUMAN DRIVER DOES NOT APPLY TO THE OPERATOR
22 OF A FULLY AUTONOMOUS VEHICLE WITH THE AUTOMATED DRIVING SYSTEM
23 ENGAGED WHILE BEING USED BY A TRANSPORTATION NETWORK COMPANY,
24 FOR-HIRE VEHICLE COMPANY, OR OTHER GROUND PASSENGER TRANSPORTATION
25 COMPANY.

26 (2) PARAGRAPH (1) OF THIS SUBSECTION MAY NOT BE INTERPRETED
27 TO EXEMPT THE PERSON WHO IS ENGAGING THE AUTOMATED DRIVING SYSTEM FOR
28 USE BY A TRANSPORTATION NETWORK COMPANY, A FOR-HIRE VEHICLE COMPANY,
29 OR ANOTHER GROUND PASSENGER TRANSPORTATION COMPANY FROM ANY
30 REQUIREMENT OF § 21-1502 OF THIS SUBTITLE.

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~~31 (c) ALL FULLY AUTONOMOUS VEHICLES SHALL BE EQUIPPED WITH AN
32 ACCESSIBLE USER INTERFACE SUCH THAT INDIVIDUALS WITH DISABILITIES ARE
33 ABLE TO INDEPENDENTLY ACCESS ALL ASPECTS AND USER FEATURES OF THE
3431 INTERFACE.~~

12 21-1507.

13 PERSONAL DATA, AS DEFINED IN § 14-4701 OF THE COMMERCIAL LAW
14 ARTICLE, THAT IS COLLECTED BY AN FULLY AUTONOMOUS VEHICLE IS SUBJECT TO
TITLE
15 14, SUBTITLE 47 OF THE COMMERCIAL LAW ARTICLE.

16 21-1508.

17 (A) IF THE ADMINISTRATION HAS INFORMATION, DATA, OR OTHER
18 EVIDENCE INDICATING THAT AN FULLY AUTONOMOUS VEHICLE IS NOT
IN SAFE
19 MECHANICAL CONDITION AND MAY ENDANGER PERSONS ON THE HIGHWAY, THE
20 ADMINISTRATION MAY ISSUE A REQUEST FOR RELEVANT INFORMATION TO THE
21 PERSON WHO SUBMITTED THE FIRST RESPONDER INTERACTION PLAN REQUIRED
BY
22 § 21-1502(B) OF THIS SUBTITLE OR THE PERSON'S SUCCESSOR.

23 (B) (1) THE PERSON WHO SUBMITTED THE FIRST RESPONDER
24 INTERACTION PLAN SHALL RESPOND TO A REQUEST FOR INFORMATION SUBMITTED
UNDER SUBSECTION (A) OF THIS SECTION WITHIN A REASONABLE TIME SPECIFIED
1 BY THE ADMINISTRATION.

2 (2) THE RESPONSE REQUIRED UNDER PARAGRAPH (1) OF THIS
3 SUBSECTION MAY BE IN THE FORM OF DOCUMENTS, A MEETING WITH THE
4 ADMINISTRATION, A DEMONSTRATION, OR ANY OTHER REASONABLE FORM OF
5 COMMUNICATION.

6 (C) (1) AFTER CONSIDERING AND EVALUATING ALL RESPONSES
7 PROVIDED UNDER SUBSECTION (B) OF THIS SECTION, IF THE ADMINISTRATION
8 DETERMINES THAT AN FULLY AUTONOMOUS VEHICLE IS NOT IN SAFE MECHANICAL
9 CONDITION AND MAY ENDANGER PERSONS ON THE HIGHWAY, THE
ADMINISTRATION
11 MAY SEND A NOTICE OF INTENT TO SUSPEND THE REGISTRATION OR IMPOSE
12 RESTRICTIONS ON THE OPERATION OF THE FULLY AUTONOMOUS VEHICLE TO THE
PERSON
13 WHO SUBMITTED THE FIRST RESPONDER INTERACTION PLAN OR THE PERSON'S

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14 SUCCESSOR.

15 (2) THE NOTICE SHALL INCLUDE:

16 (I) A DESCRIPTION OF THE ADMINISTRATION'S REASONS FOR
17 SUSPENDING THE REGISTRATION OR RESTRICTING OPERATION OF THE
18 FULLY AUTONOMOUS VEHICLE AND EVIDENCE SUPPORTING THE DETERMINATION;
AND

19 (II) A STATEMENT REQUIRING THAT A CERTIFICATION OF
20 CORRECTION OR ADJUSTMENT BE SUBMITTED WITHIN A SPECIFIED TIME AND THAT
21 THE CERTIFICATION INCLUDE AN EXPLANATION OF HOW THE ISSUES IDENTIFIED
BY THE ADMINISTRATION IN THE NOTICE HAVE BEEN ADDRESSED.

22 (D) (1) IF THE PERSON WHO SUBMITTED THE FIRST RESPONDER
23 INTERACTION PLAN FOR THE FULLY AUTONOMOUS VEHICLE THAT IS THE SUBJECT
OF A
24 NOTICE OF INTENT TO SUSPEND THE REGISTRATION OR RESTRICT OPERATION OR
25 THE PERSON'S SUCCESSOR FAILS TO SUBMIT THE CERTIFICATION OF CORRECTION
26 OR ADJUSTMENT WITHIN THE TIME SPECIFIED, OR THE ADMINISTRATION FINDS
27 THAT THE CERTIFICATION OF CORRECTION OR ADJUSTMENT IS INSUFFICIENT, THE
28 ADMINISTRATION SHALL NOTIFY THE PERSON THAT THE REGISTRATION FOR THAT
FULLY
29 AUTONOMOUS VEHICLE HAS BEEN SUSPENDED OR THE OPERATIONS OF THE FULLY
30 AUTONOMOUS VEHICLE HAVE BEEN RESTRICTED.

31 (2) IF THE PERSON LATER SUBMITS THE REQUIRED CERTIFICATION,
32 THE ADMINISTRATION SHALL REMOVE THE SUSPENSION OR RESTRICTION ON
33 RECEIPT OF THE CERTIFICATION.

1 (E) (1) A PERSON MAY REQUEST A HEARING TO DISPUTE THE
ADMINISTRATION'S FINDING TO SUSPEND THE VEHICLE
REGISTRATION OR
2 RESTRICT OPERATION WITHIN 10 DAYS AFTER THE DATE OF ISSUANCE OF THE
3 NOTICE OF INTENT REQUIRED BY SUBSECTION (D) OF THIS SECTION.

4 (2) A HEARING REQUESTED UNDER THIS SUBSECTION SHALL BE
5 HELD WITHIN 30 DAYS AFTER THE SUBMISSION OF A HEARING REQUEST.

5 (3) IF A HEARING IS NOT HELD DURING THE PERIOD REQUIRED BY
THIS SUBSECTION, THE SUSPENSION OR RESTRICTION IMPOSED SHALL BE
AUTOMATICALLY REMOVED, AS APPLICABLE.

6 (43) A DECISION TO UPHOLD THE DETERMINATION OF THE
7 ADMINISTRATION IS SUBJECT TO APPEAL TO THE CIRCUIT COURT FOR THE COUNTY

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8 IN WHICH THE PERSON WHO REQUESTED THE HEARING RESIDES.

9 **21-1509.**

10 (A) SUBJECT TO SUBSECTIONS (B) AND (C) OF THIS SECTION, A FULLY
11 AUTONOMOUS VEHICLE SHALL MAINTAIN:

12 (1) PROOF OF FINANCIAL RESPONSIBILITY IN THE SAME FORM AND
13 AT THE SAME MINIMUM LIMITS AS REQUIRED BY TITLE 17 OF THIS ARTICLE;

14 (2) PERSONAL INJURY PROTECTION BENEFITS AS REQUIRED BY §
15 19-505 OF THE INSURANCE ARTICLE; AND

16 (3) UNINSURED MOTORIST BENEFITS AS REQUIRED BY § 19-509 OF
17 THE INSURANCE ARTICLE.

18 (B) (1) A FULLY AUTONOMOUS VEHICLE WITH ITS AUTOMATED DRIVING
19 SYSTEM ENGAGED SHALL MAINTAIN PROOF OF FINANCIAL RESPONSIBILITY IN AN
20 AMOUNT NOT LESS THAN \$1,000,000 COMBINED SINGLE LIMIT PER OCCURRENCE
21 FOR THIRD-PARTY LIABILITY.

22 (2) MAKERS OF INSURANCE POLICIES AND SELF-INSURANCE
23 PROGRAMS MAY CONTRACT AND COORDINATE WITH EACH OTHER TO DETERMINE
24 WHICH WILL SATISFY PERSONAL INJURY PROTECTION AND UNINSURED MOTORIST
25 BENEFIT REQUIREMENTS.

26 (C) FINANCIAL RESPONSIBILITY UNDER SUBSECTION (B) OF THIS SECTION
27 MAY BE SATISFIED BY HOLDING:

28 (1) AN INSURANCE POLICY ISSUED BY AN INSURER LICENSED IN THE
STATE; OR (2) A SURPLUS LINES POLICY ISSUED BY AN ELIGIBLE
NONADMITTED INSURER AUTHORIZED UNDER TITLE 3, SUBTITLE 3 OF THE INSURANCE
ARTICLE.

1 (D) NO HIGHER LIMITS OF INSURANCE OR ADDITIONAL COVERAGES SHALL
2 BE REQUIRED SOLELY DUE TO AN FULLY AUTONOMOUS VEHICLE'S USE OF AN
AUTOMATED
3 DRIVING SYSTEM.

21-1511.

(A) A PERSON MAY OPERATE A MOTOR VEHICLE EQUIPPED WITH
AN AUTOMATED DRIVING SYSTEM THAT IS CAPABLE OF

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PERFORMING THE ENTIRE DYNAMIC DRIVING TASK BUT IS NOT DESIGNED TO OPERATE AS A FULLY AUTONOMOUS VEHICLE IF:

(1) SUCH AUTOMATED DRIVING SYSTEM WILL ISSUE A REQUEST TO INTERVENE WHENEVER THE AUTOMATED DRIVING SYSTEM IS NOT CAPABLE OF PERFORMING THE ENTIRE DYNAMIC DRIVING TASK WITH THE EXPECTATION THAT THE PERSON WILL RESPOND APPROPRIATELY TO SUCH A REQUEST; AND

4(2) THE AUTOMATED DRIVING SYSTEM IS CAPABLE OF OPERATING IN ACCORDANCE WITH THE MARYLAND VEHICLE LAW, UNLESS THE ADMINISTRATION HAS ADOPTED A REGULATION EXEMPTING SUCH VEHICLES FROM SPECIFIC PROVISIONS OF LAW.

54 SECTION 2. AND BE IT FURTHER ENACTED, That this Act shall take effect
10 October 1, 2026.