



March 2, 2025

The Honorable William C. Smith, Jr.
Chair, Senate Judicial Proceedings Committee
251 Taylor House Office Building
Annapolis, Maryland 21401

**SB 909: Vehicle Laws - Fully Autonomous Vehicles
Position: Favorable with Amendments**

Chair Smith:

The Alliance for Automotive Innovation¹ (Auto Innovators) appreciates the opportunity to express our support, if amended, for SB 909. With the proper amendments, SB 909 will establish a legal framework that supports the full deployment of AVs and will better equip Maryland's residents, businesses, transportation system, environment, and law enforcement to take advantage of the benefits presented by this technology.

AVs Can Improve Safety

The cars and trucks that consumers are buying today are the safest vehicles ever built. Even so, more than 39,345 people died in traffic crashes in the United States in 2024, including 476 in Maryland last year²³. The evidence shows that driver behavior – drivers who are impaired, unbelted, speeding, or driving recklessly – are significant factors in the increase in roadway fatalities. That is what vehicle safety is a priority and automated vehicle technology holds the promise to increase safety and reduce these numbers.

AV Deployment Is a Key Component of American Competitiveness

Autonomous driving has the attention of Washington, D.C., and the state's – and rightly so. Government has a role to play here, with governments at the state and federal level playing their traditional regulatory roles. Regulatory harmonization and coordination are key to creating a clear pathway for AV deployment and the significant safety, mobility and efficiency benefits that AVs promise. On top of the obvious safety benefits, AVs can provide accessible transportation options for seniors and individuals with disabilities and a chance to reduce traffic congestion and create new jobs and supply chains. All stakeholders should strive toward building trust within the AV ecosystem.

The sooner advanced automated driving systems can be brought to market and into the roadgoing fleet, the sooner the lifesaving promise of this technology may be realized. To fulfill this potential,

¹ From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. Active in Washington, D.C. and all 50 states, the association is committed to a cleaner, safer and smarter personal transportation future.

² <https://zerodeathsmd.gov/resources/crashdata/crashdashboard/>

³ <https://www.nhtsa.gov/press-releases/nhtsa-estimates-39345-traffic-fatalities-2024>

our members – both automakers and technology suppliers – must have regulatory consistency and regulatory certainty. As you are aware, the design and planning of a new vehicle takes between 5-7 years, as the modern vehicle is comprised of over 30,000 parts, sourced from thousands of different suppliers, and each must be designed, integrated, produced, and assembled.

The longer it takes to get that regulatory structure, like SB 909, in place, the more skittish AV developers are going to get, especially when there is competition for capital for other pressing priorities related to electrification and battery manufacturing everywhere. Even if we don't get our act together in the U.S., the technology isn't going away. We'll cede our AV leadership to China and other nations already setting the right conditions to make AVs a reality.

Requested Amendments

While we support the general direction of the bill, it will benefit from suggested amendments. Innovative technologies that can make a difference have already been developed or are well on the way to being made commercially available. As introduced, the bill does not currently account for Level 3 ADS equipped vehicles, which are currently in the marketplace. Relevant definitions should be added to permit the operation of L3 vehicles by private owners in the state. Without this clarity, manufacturers are unlikely to bring Level 3 technology to the state's marketplace.

We also suggest amending the hearing requirements to ensure that suspensions and restrictions do not remain in place indefinitely or for long periods of time due to administrative delays. This mirrors language in other AV bills and laws that contain similar enforcement regimes.

As originally drafted, subsection (c) would mandate that all AVs be equipped with a user interface, which would not be necessary or relevant to all AVs. We would also have concerns with imposing what could be a design requirement, given the federal government's role in establishing uniform vehicle design requirements. State specific vehicle design requirements are an obstacle to innovation, and we suggest a more tailored approach.

Conclusion

AVs hold tremendous promise for a cleaner, safer, smarter future for mobility, but only if we work together on smart policies, like SB 909, that are modernized to address the tremendous opportunities that AV technologies hold when it comes to improving roadway safety and expanded mobility for millions of Americans. As our companies start to make plans and critical decisions about where and how and when to build and deploy these technologies, they need to know that policies are in place here in the U.S. that will support those plans and those decisions.

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

Sincerely,

A handwritten signature in black ink that reads "Josh Fisher". The signature is written in a cursive style with a prominent loop at the end of the name.

Josh Fisher
Senior Director
Alliance for Automotive Innovation.