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March 4, 2026

The Honorable William C. Smith, Jr.  
Chair, Senate Judicial Proceedings  
2 East, Miller Senate Office Building  
Annapolis, MD 21401

***RE: Letter of Support w/ Amendments – Senate Bill 909 – Vehicle Laws – Fully Autonomous Vehicles***

Dear Chair Smith and Committee Members:

The Maryland Department of Transportation (MDOT) supports Senate Bill 909, with amendments, as an important adaptation of Maryland transportation law to accommodate modern technology while supporting a growing industry that caters to underserved communities' mobility needs.

SB 909 establishes a statutory framework for the operation of fully autonomous vehicles (AVs) on Maryland roadways. Additionally, the bill establishes that certain data collected by fully autonomous vehicles is subject to the Online Data Privacy Act.

The MDOT wants to note that it has worked with the sponsor and stakeholders on this legislation. We appreciate the willingness of the sponsor to work with us on this critical legislation.

The MDOT recognizes that AVs provide a tremendous opportunity to improve safety on the roadways, transportation accessibility, and resilient supply chains. As of 2025, 26 states have passed laws that enable the testing and deployment of autonomous vehicles on public roads. While the number of vehicle-related fatalities and injuries across the State has seen a recent decrease, the MDOT believes more can be done to address the loss of life and personal injury. MDOT's Serious About Safety initiative is designed to provide the safest transportation network in the nation. As a Vision Zero state, the MDOT is committed to doing everything in our power to support the State's goal of eliminating all vehicle-related deaths and serious injuries on our roadways by 2030. The MDOT sees the successful deployment of fully autonomous vehicles as a component of an effective safety strategy.

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 unite all interested parties and collaborate on the issue, including industry, first responders, business development, safety advocates, and government; this has been recognized as a successful model across the country. While the MVA has issued a number of permits under existing statutory authority to entities to test CAVs in Maryland, there are currently no active testing permits in Maryland.

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The framework for SB 909 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, but the MVA system is already capable of recording the level of autonomy for a vehicle. The MVA is already familiar with dissemination of first responder plans through the current testing permit process.

For the safety of people on Maryland's roads, SB 909 would authorize the Administration to suspend the registration of an AV if the vehicle presents safety concerns. The MDOT appreciates this inclusion following discussion with the stakeholders on this issue last year.

The MDOT is in conversation with the sponsor regarding – and will continue to collaborate on – amendments to SB 909. Specifically, these amendments include strengthening the MVA's ability to receive critical safety-related data from companies, manage the distinct differences and unique considerations around light and heavy duty/commercial motor vehicles, and enhance the MVA's intervention authorities when needed for safety.

The Maryland Department of Transportation respectfully requests that the Committee consider this information during its deliberation and grant Senate Bill 909 a favorable report with the proposed amendments.

Respectfully submitted,

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