



November 14, 2017

Docket Management Facility, M-30
U.S. Department of Transportation
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Docket ID: NHTSA-2017-0082, Automated Driving Systems: A Vision for Safety

The Institute of Transportation Engineers (ITE) is pleased to provide comments on the National Traffic Highway Safety Administration's (NHTSA) recent guidance, Automated Driving Systems: A Vision for Safety v2.0, published in the Federal Register September 15, 2017.

ITE is an international membership association of transportation professionals who work to improve mobility and safety for all transportation system users and help build smart and livable communities. Through its products and services, ITE promotes professional development and career advancement for its members, supports and encourages education, identifies necessary research, develops technical resources including standards and recommended practices, develops public awareness programs, and serves as a conduit for the exchange of professional information. Founded in 1930, ITE is a community of more than 14,000 transportation professionals, including transportation engineers, transportation planners, consultants, educators, technologists, and researchers, who network through meetings, seminars, and publications. ITE believes strongly that technology such as connected and automated vehicles are an important element in achieving "Vision Zero" — an international movement to end fatalities on our roadways.

As such, we appreciate and applaud the administration for updating your views on this important topic, and are pleased to provide our comments.

ITE agrees with NHTSA that the promise of safer vehicle systems is closer to becoming a reality, and we support the integration of automated driving systems (ADS) technology to ensure its safe testing and deployment, as well as encouraging the development of systems that guard against cyber-attacks and protect consumer privacy.

We further support NHTSA's emphasis on common terminology, and reliance on the SAE J3016 taxonomy of definitions for everyone involved. Use of the term Automated Driving Systems (ADS) as a replacement to 2016's phraseology of Highly Automated Vehicles (HAV) is a welcome update.

Our principal comment concerns the lack of specificity in terms of vehicles with ADS coordinating and connecting with the infrastructure — notably through connected vehicle (CV) technology that has been researched, pilot tested, and proposed as a possible mandate through separate NHTSA action. Dividing the discussion between CV and ADS isn't productive, and in the opinion of many experts, deployment of

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CV strategies enabled through vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) connectivity is necessary to both realize the full potential of ADS, as well as enable improvements in safety and mobility that deployment of ADS alone cannot provide.

Future versions of this guidance should include an emphasis on ADS coordination through V2I and vehicle-to-vehicle (V2V) connectivity.

Additional Comments:

- Under Section 1, Item 10 (Data Recording), NHTSA should consider stronger language, up to and including a requirement, that the data provided not only be safety/incident focused, but include data that would help State and Federal agencies implement efficient mobility strategies. This data could be very valuable as we try to better understand where and how crashes occur, and could be directly used for implementing and improving infrastructure elements. ITE hopes NHTSA will continue to support the transparent sharing of ADS data not just for crash reconstruction, but for planning and operations as well.
- Under Section 1, Voluntary Safety Assessment, ITE suggests that NHTSA provide a more systematic safety self-assessment mechanism for manufacturers to submit information. This will serve to better inform States in advance of – or during – testing with specific vehicles, manufacturers, or organizations. An emphasis on transparency would help to ensure the public’s buy-in and support for ADS, and could be achieved by a publicly-accessible website that provides links for consumers and other policymakers to access publicly disclosed safety assessments by manufacturers.
- Under Section 2, Item 6 (Working with Public Safety Professionals), NHTSA should consider additional language – possibly in Section 1 – encouraging manufacturers to engage in dialog with first responders and law enforcement to ensure that post-crash behavior mechanisms adequately address the concerns of those personnel directly responsible for managing incident scenes. Putting the entire onus on the public sector isn’t enough, NHTSA should also encourage the manufacturers to reach out during the design and testing stages.
- As a general comment, manufacturers should be encouraged in stronger terms to coordinate and collaborate with transportation infrastructure owners and operators to make sure both understand the implications of ADS operation and maximization of the benefits of ADS by making changes in design or operations of infrastructure, installing ADS specific infrastructure elements, and ensuring necessary levels of infrastructure maintenance and construction.

Thank you for the opportunity to comment on this important information distributed by NHTSA. We look forward to participating in additional public workshops and supporting federal research that can help quickly bring this vital life-saving technology to bear.

Sincerely yours,



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