



March 17, 2025

The Honorable Sean Duffy
 Secretary
 U.S. Department of Transportation
 1200 New Jersey Ave SE
 Washington, DC 20590

Dear Secretary Duffy,

The undersigned organizations write to urge the U.S. Department of Transportation (USDOT) to champion policies that promote American leadership in the autonomous vehicle (AV) sector.

Today, many Americans are using AVs in a variety of ways, including to improve mobility and help deliver goods across the country. In many ways, we are just beginning to see the full benefits of this growing industry. The widespread and safe deployment of AVs will increase the safety of our traveling public; lower healthcare costs; improve the mobility of the elderly, blind and disabled Americans; bolster our supply chain; reduce emissions; and strengthen the economy.

However, the Federal government has an important role to play in ensuring a safe and accessible future. We urge you to prioritize smart and innovative AV policies that support U.S. leadership—consistent with the goals envisioned by President Trump in his first term. The AV industry has made significant strides by working with governments and private sector partners to safely deploy AV technologies into the nation’s transportation network. If the Federal

government fails to act to advance sensible AV policies, we will cede our leadership in this economically crucial sector to China.

Therefore, we urge you to prioritize the following actions in order to advance our nation's leadership in this space:

Advance an AV Safety Framework

In 2020, the National Highway Traffic Safety Administration introduced its "Framework for Automated Driving System (ADS) Safety." The AV industry needs one national performance-based framework that ensures a safety-first approach and enables innovation across all vehicle classes. NHTSA should prioritize this framework by proposing a rule that incorporates recommendations of this coalition as urgently as possible.

Clarity on Federal Authority

NHTSA must assert its role as the sole regulator of ADS hardware, software and operation for passenger vehicles. This ensures NHTSA has exclusive authority to test, approve, and oversee ADS technologies, enforcing compliance through Federal Motor Vehicle Safety Standards (FMVSS). Multiple agencies and state regulatory regimes create inconsistent rules, risking safety gaps and eroding public trust—only NHTSA's expertise can uphold the rigorous safety benchmarks of FMVSS.

Modernize Federal Motor Carrier Safety Regulations

The Federal Motor Carrier Safety Administration (FMCSA) should codify the 2018 interpretation that Federal Motor Carrier Safety Regulations (FMCSRs) do not require a human driver to operate or be present in a commercial motor vehicle (CMV) being operated by a Level 4 or Level 5 ADS, including updates to existing hours of service rules and inspection requirements that require action by a human driver.

Authorize Innovative Warning Technologies

FMCSA should facilitate the safe deployment of ADS-equipped CMVs by providing a clear path for *all* CMVs to use innovative cab-mounted warning beacons instead of the out-of-date warning devices that require drivers to dangerously walk along the side of the highway. FMCSA should approve the use of cab-mounted warning beacons, and the ADS-Equipped CMV rulemaking should include a long-term update to the warning device regulation and be expeditiously finalized.

Clarify and Codify Interpretations to Ensure Industry Certainty

NHTSA should move swiftly with an immediate interpretation, followed by a rulemaking, to clarify that no manually operated driving controls, or physical equipment that is solely intended to support a human driver, are required in Level 4 or Level 5 ADS-dedicated vehicles. Furthermore, the interpretation and the rulemaking should ensure that an operator's license shall not be required for passengers to ride in an AV, eliminating the possibility of discrimination based on disability. Such action will support AV innovation by avoiding the imposition of requirements that were created before ADS were envisioned. This action will help eliminate unnecessary barriers to the integration of safety-improving transportation technologies into our transportation system, as well as ensuring American leadership in ADS technology.

Thank you for your consideration, and we look forward to working together to accomplish these priorities.

Sincerely,

Alliance for Automotive Innovation
American Trucking Associations
Association for Uncrewed Vehicle Systems International
Autonomous Vehicle Industry Association
Blinded Veterans Association
Chamber of Progress
Coalition for Reimagined Mobility
Consumer Technology Association
Intelligent Transportation Society of America
National Federation of the Blind
NetChoice
TechNet
United Spinal Association
Zero Emission Transportation Association

Cc: National Highway Traffic Safety Administration
Federal Motor Carrier Safety Administration