CHAMBER OF PROGRESS

August 16, 2022

Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue SE
Washington, D.C. 20590

Re: Support of General Motors' petition for Temporary Exemption for the Cruise Origin (Docket No. NHTSA-2022-0067)

Dear Administrator Cliff:

On behalf of the Chamber of Progress, a tech industry association committed to ensuring that all Americans benefit from technological leaps, I write to express our support of General Motors' petition for a temporary exemption for the Cruise Origin.

By granting GM's petition for exemption for the Origin, NHTSA would advance an important regulatory pathway for the safe deployment of autonomous vehicles and enable their positive impacts on communities across the country.

The Origin, with its fully electric self-driving capabilities, could have a tremendous impact on our communities – including improving safety, promoting sustainability, mitigating transit gaps, combating food deserts, and increasing mobility for the elderly and disabled.

Autonomous vehicles will bring safer streets and reduce the number of accidents. Nearly 43,000 lives were lost in traffic-related fatalities in 2021, a 10.5% increase from 202.[1] Research shows that at least 90% of car crashes are caused by human error, and studies suggest that putting AVs on the road now could save hundreds of thousands of lives over the long term.

Autonomous vehicles can positively impact the environment and promote sustainability efforts. Through high-speed driving, braking, and re-acceleration, humans burn a lot of gas and energy while driving.[2] According to the Southwest Research Institute, through

[1]Traffic Safety Facts: Crash Stats, U.S. Department of Transportation, National Highway Traffic Safety Administration (May 2022) https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813298?source=email
[2]Ashleigh Rose-Harman, *The Environmental Benefits of Driverless Cars*, Greener Ideal, (Nov. 2021), https://greenerideal.com/news/vehicles/driverless-cars-environmental-benefits/.

connectivity and automation, vehicles can reach 20% improvement in fuel efficiency.[3] Since autonomous vehicles are programmed to follow traffic rules and speed limits, autonomous vehicles will ultimately burn less gas and energy. Adding to these benefits, the Origin is a fully electric vehicle, enabling passengers to travel both safely and sustainably.

Autonomous vehicles will help mitigate transit gaps. Traditional transit systems have historically contributed to inequality for disadvantaged minority and disabled communities. Research shows that Black people are more likely to rely upon public transportation accounting for 60% of all public transit riders. In addition, Black and Brown people are more likely to experience commutes to work that are 60 minutes or longer, one way.

Autonomous vehicles will help to combat food deserts. Residents in low food access areas continue to be plagued by the food desert crisis and are forced to travel far away to grocery stores. In some communities, AVs deliver groceries and food via low-speed, seatless, passengerless autonomous vehicles. With this technology, residents that live outside food-rich areas have the same convenient and affordable access to fresh fruits, vegetables, milk, and meat they need to live happily and healthily.

Autonomous vehicles will increase mobility for the elderly and disabled. Safe autonomous vehicles can't arrive fast enough for the blind and other people living with disabilities. 13.4 million Americans between the ages of 18 and 64 have self-reported travel-limiting disabilities.[4]

For the reasons cited above, we urge the Agency to favorably grant GM's petition for exemption. Thank you for your consideration.

Sincerely,

Jamie Pascal
Director of Civic Innovation Policy
Chamber of Progress

---

[3] *SwRI Achieves 20% Improvement in Vehicle Fuel Efficiency with Connectivity, Automation*, Southwest Research Institute, (Nov. 2021) https://www.swri.org/press-release/vehicle-fuel-efficiency-improvement-connectivity-automation-arpa-e-nextcar .

[4] Travel Patterns of American Adults with Disabilities, U.S. Department of Transportation, Bureau of Transportation Statistics (Jan. 2022) https://www.bts.gov/travel-patterns-with-disabilities