



June 15, 2023

The Public Utilities Commission of the State of California  
Consumer Protection and Enforcement Division  
505 Van Ness Avenue  
San Francisco, CA 94102-3214  
(Submitted via email at: [AVPrograms@cpuc.ca.gov](mailto:AVPrograms@cpuc.ca.gov))

**Re: Chamber of Progress Comments on CPUC Proposed Rules for New Data Reporting Requirements for Autonomous Vehicles Driverless Deployment Program**

Dear Commissioners:

On behalf of the Chamber of Progress, a tech industry association committed to ensuring that all Americans benefit from technological leaps, I write in response to the draft rule proposed by the Consumer Protection and Enforcement Division of the California Public Utilities Commission for new data reporting requirements pertaining to the Autonomous Vehicles Driverless Deployment program.

Chamber of Progress supports public policies at the federal and state level that seek to build a fairer, more inclusive country in which all Americans benefit from technological leaps. We are strong proponents of autonomous vehicles because of the potential to save hundreds of thousands of lives and benefit our communities – mitigating transit gaps, combating food insecurity, and increasing mobility for the elderly and disabled.

Autonomous vehicles will bring safer streets and reduce the number of accidents. The National Highway Traffic Safety Administration (NHTSA) released crash data reporting for 2022, which estimates 42,795 lives were lost in traffic-related fatalities. 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 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. For the blind and other people living with disabilities, safe autonomous vehicles can't arrive fast enough. 13.4 million Americans between the ages of 18 and 64 have self-reported travel-limiting disabilities.<sup>1</sup>

We support the Commission's commitment to promoting safety and transparency in its regulation of passenger carriers, particularly regarding AVs. **However, we are concerned that the proposed rule's new data reporting requirements would be duplicative of existing requirements.** The Commission, the California Department of Motor Vehicles, and NHTSA currently require participants in its AV Programs to submit numerous reports. Those reports are either forwarded directly to the Commission or made available to the public.

For these reasons, we respectfully request the Commission amend the proposed rule to develop more efficient data reporting guidelines without delaying the promise of AVs. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie Pascal". The signature is fluid and cursive, written in a professional style.

Jamie Pascal  
Director of Civic Innovation Policy  
Chamber of Progress

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<sup>1</sup> 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>