



November 20, 2023

William Scott
Chief of Police
San Francisco Police Department
1251 3rd St
San Francisco, CA 94158

Grant Nash Colfax, MD
Director of Health
San Francisco Dept. of Public Health
101 Grove Street
San Francisco, CA 94102

Jeffrey Tumlin
Director of Transportation
San Francisco Municipal Transportation
Agency
1 Van Ness Ave
San Francisco, CA 94103

Douglas Ito
Director of Consumer Protection and
Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3214

Dear Chief William Scott, Dr. Grant Colfax, Dir. Jeffrey Tumlin, and Dir. Douglas Ito:

I write today to urge the release of backlogged crash data detailing traffic accidents and injuries caused by human drivers in San Francisco. As policymakers consider the future of autonomous vehicles in San Francisco and the state of California, it's critical they have available points of comparison on the track record of human drivers in the same area.

Unfortunately, both San Francisco's Traffic Crashes Resulting in Injury Database¹ and California's TNC Data Portal² are substantially delinquent in making human driver crash data publicly available.

Nine years ago, San Francisco committed to pursuing Vision Zero, adopting the ambitious goal of eliminating all traffic fatalities and reducing severe traffic injuries in the city. As part of that goal, the city set out to better document how, when, and where traffic crashes, injuries, and deaths happen on city streets.

¹<https://data.sfgov.org/Public-Safety/Traffic-Crashes-Resulting-in-Injury/ubvf-ztfx>

²<https://www.cpuc.ca.gov/regulatory-services/licensing/transportation-licensing-and-analysis-branch/transportation-network-companies/tnc-data-portal>



Tragically, as Vision Zero nears its tenth year, the city and state's transparency efforts on crash data appear to have stalled. Public records stipulate that San Francisco's data on traffic crashes resulting in injury should be made publicly available approximately a month after the end of the previous quarter.³ Unfortunately, no data has been released by the city since the first quarter of 2023.

Similarly, CPUC's TNC Data Portal, which tracks rideshare incidents in the state of California, is significantly out of date. There, the most recent data released is from 2021.

As autonomous vehicles (AVs) are introduced to the streets of San Francisco and policymakers weigh the safety and accessibility benefits of AVs, it's important that decision-making be informed by a thorough examination of current traffic data. That includes not just data on fatalities - which have been the sole provenance of human drivers to date in San Francisco - but also data on injuries and accidents.

NHTSA's nationwide data on the fatality, injury, and accident rate of human drivers fails to provide a relevant point of reference for the safety of AV vehicles in San Francisco. Research shows that different driving environments result in substantially different crash rates.⁴ Comparing the incident rate of San Francisco's AVs to the incident rate of vehicles in the U.S. at large provides a misleading picture of AV safety. Where more precise comparative research has been possible, the lower-rate of AV collisions and traffic injuries appears promising.⁵

From the regulation of AVs in San Francisco - where collision reports must be filed within 10 days of an incident⁶ - we know that timely, and transparent traffic incident reporting is possible. While it is unlikely human drivers will be held to the same standard as AVs, we urge San Francisco and California policymakers and law enforcement to meet *their own standards* for publicly reporting fatalities, injuries, and accidents caused by drivers.

Ultimately, we believe that local policymakers, law enforcement, and AV operators all want to achieve the same goal: safer streets. In order to achieve that goal, we urge San Francisco and California to approach AV technology with a commitment to data-driven decision making that prioritizes human life and safety.

³<https://data.sfgov.org/Public-Safety/Traffic-Crashes-Resulting-in-Injury/ubvf-ztfx>

⁴<https://deepblue.lib.umich.edu/handle/2027.42/178179>

⁵<https://getcruise.com/news/blog/2023/human-ridehail-crash-rate-benchmark/>

⁶<https://www.dmv.ca.gov/portal/vehicle-industry-services/autonomous-vehicles/autonomous-vehicle-collision-reports/>



CHAMBER OF PROGRESS

With an eye on the data, and by making data available for public study, it is still possible for San Francisco to achieve the Vision Zero goal which has eluded policymakers for too long.

Sincerely,

A handwritten signature in blue ink that reads "Adam Kovacevich".

Adam Kovacevich
CEO & Founder