August 15, 2018

Autonomous Vehicle Task Force

RE: HB 4063 Autonomous Vehicle Regulatory Recommendations


The Technology Association of Oregon (TAO) is a technology trade association that seeks to establish Oregon as a world-class, inclusive innovation-based economy. We work with over 470 tech and tech-enabled companies in Oregon, ranging from some of the largest technology companies in the world to early-stage startups. We have offices in Eugene, Bend, and Portland and offer services around the state. Our programs focus on helping companies to grow and remain competitive, and we have a particular emphasis on inputs to growth such as talent, capital, and the business environment.

AVs will improve safety on the roads – computers don’t text, drive under the influence or get distracted. AVs will also improve mobility options for those with disabilities. Having AVs on the road and in use will also reduce congestion and improve the commute for all those on the road.

TAO appreciates the hard work that the task force has done to study the various issues surrounding smart AV regulation. The American Association of Motor Vehicle Administrators (AAMVA) urges states to “[d]evelop strategies for testing and deployment of HAVs.” if Oregon wants to be welcoming of new technology, state law must create a path for commercial operation of AVs, including AVs without human drivers.

The last full task force meeting focused on testing recommendations where it was declared that the focus of the proposed regulations was to be testing, not deployment. This is problematic for several reasons. One, self-driving cares are here. Already millions of miles have already been driven by AVs. During the course of testing only one person has been killed by a self-driving car. Contrast this with national drunk driving statistics that state that 28 people a day die from drunk driving. Additionally, there is no shortage of places across the country to test, Oregon is behind. If Oregon wants to get ahead, it needs to encourage deployment, not resist it.

Moreover, recommendations for deployment can be developed quickly, even absent additional federal guidelines. Other states including both Washington and California have already developed a regulatory structure for deployment and present a guide for Oregon to follow.
Finally, we are concerned that despite the large size of the task force, that industry experts and practitioners with deep knowledge of the issues at hand are underrepresented. For example, two of the four subcommittees do not have any members with backgrounds in technology. Adding representatives with strong understanding of the technology will facilitate progress on deployment recommendations.

Our view is that adopting testing regulations alone is insufficient. The task force ought to also adopt regulations paving the way for commercial deployment.

Sincerely yours,

Skip Newberry
President & CEO, Technology Association of Oregon