August 20, 2019

Dear Members of the Oregon AV Task Force:

On behalf of our members and clients, representing a broad and diverse coalition of leading technology and industry companies, we write to express concerns regarding the League of Oregon Cities Memo Regarding Public Sector Information Needs to Guide AV Policy and Manage AV Testing/Deployment.

It is our understanding that the Memo was first discussed last week in the Land Use Subcommittee and submitted for review to the Cybersecurity & Privacy Subcommittee on Wednesday. The Privacy Subcommittee chose not to take a position on the memo, largely citing timing concerns. Our members have significant concerns with the limited time and consideration given to this broad sweeping policy memo and urge the Full Task Force to reject its inclusion in the Task Force Report due to lack of consideration and feedback.

Our members and clients believe a robust discussion on AV Testing and Deployment is welcome and we want to be fully engaged with the Task Force and their deliberations. However, it is difficult for stakeholders to provide meaningful input when recommendations are provided with very little notice.

Substantively, the memo lays out many transportation related issues, such as taxes, traffic congestion and infrastructure but none of the issues directly relates to cybersecurity or privacy, while the memo makes sweeping privacy policy statements. While the memo lays out several data points it believes would be helpful in managing transportation flow, it is silent on the existing infrastructure available to local governments (such as traffic cameras).

We ask the Task Force to table the League of Oregon Cities Memo Regarding “Public Sector Information Needs to Guide AV Policy and Manage AV Testing/Deployment” until there is an opportunity for full discussion on its merits or submit this letter for further consideration at the AG’s Privacy Work Group.

Respectfully,

CompTIA
Internet Association

TechNet
Technology Association of Oregon