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March 14, 2016

Rep. Joe Graves
Chair, Committee on Commerce and Trade
S0985 HOB
124 North Capitol Avenue
Lansing, MI 48909-7514

Rep. Peter Pettalia
Chair, Committee on Transportation and Infrastructure
S1485 HOB
124 North Capitol Avenue
Lansing, MI 48909-7514

Dear Mr. Chairmen:

Google appreciates Michigan's interest in autonomous vehicles (AV) and the goal of encouraging development of AV technology. As the legislature considers updating its laws governing autonomous vehicles we would like to offer some comments from the developer perspective that we hope the legislature will take into consideration.

Though significant advances are being made, AV technology is still in the formative stages of development. As such, any legislative or regulatory requirements imposed now risk being overtaken by advancements in the technology or stifling that advancement. This is especially true if the basis for these laws or regulations is an assumption about a particular direction of the technology or a supposition that all AV enabled vehicles will have the same design and functionality as current non-AV vehicles.

Instead of attempting to corral the technology, states would be better served by assessing what they can do to ensure that any statutory or regulatory hindrances that unnecessarily limit or proscribe the full potential benefits are cleared away in anticipation of autonomous vehicles. Reviewing the state motor vehicle laws and code is one way to start this process. Tasking the relevant agencies with keeping close tabs on the progress of technology development is another.

States should also be cognizant that vehicles are interstate by nature. Federal standards cover all vehicles in the US and are designed to prevent a variety of unique or peculiar state requirements which could hinder the free movement of vehicles or the occupants within. In the case of AV laws, if states adopt such varied requirements as have been part of the more than 50 proposals introduced in almost half the states in the last two years, then the resulting patchwork will create impediments to cross-border movement.

To the extent that laws begin to prescribe technological mandates they will stifle and not encourage autonomous technology. California recently released a set of draft regulations on AV technology and instead of fostering innovation, they ended up creating an arbitrary ceiling on the potential for fully self-driving cars to reach their full benefit.

That states are eager to encourage autonomous vehicle technology is appreciated. However, preemptively imposing laws on technology that is still in a nascent stage sends the wrong signal.

Sincerely,

Ron Barnes
Head of State Legislative Affairs

cc: Sen. Mike Kowall
Kirk T. Steudle, Director MDOT