



NARC

Building Regional Communities

National Association of Regional Councils

660 North Capitol Street NW, Suite 440

Washington, DC 20001

202.986.1032

www.narc.org

December 3, 2018

Docket Operations
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Room W12-140
Washington, DC 20590

Re: DOT-OST-2018-0149

Dear Docket Clerk:

The National Association of Regional Councils (NARC) appreciates the opportunity to comment on the U.S. Department of Transportation's "Preparing for the Future of Transportation: Automated Vehicles 3.0 (AV 3.0)" Notice of Request for Comments (Docket Number DOT-OST-2018-0149). NARC represents regional planning organizations and metropolitan planning organizations (MPO) in communities large and small. These organizations engage the public, bring together local elected officials to plan transportation systems at a regional scale, and distribute federal funding. Many of our members, through their planning processes, consider how transportation intersects with land use, environment, safety, workforce, economic development, and equity. These are many of the same issues that U.S. DOT recognizes in AV 3.0 as central in the successful testing and deployment of automated vehicles.

NARC applauds the multi-modal approach taken in AV 3.0, recognizing the vital importance of keeping all road users safe in the testing and deployment of automated vehicles. The opportunity to transform mobility must not come at the risk of system users. The primary role U.S. DOT must play in this process – whether through voluntary guidance and self-certification or through increased regulation – must be to ensure that we do not sacrifice our obligation to save lives and keep all system users safe. As AV 3.0 also correctly recognizes, prioritizing safety is a crucial part of increasing public confidence in emerging technologies.

The integration of automated vehicles into the nation's transportation system should not come at the expense of all local autonomy. Local governments own a significant portion of the nation's transportation network, and therefore deserve a significant say in how these new technologies are deployed. Just as federal law at present does not preempt states from setting different speed limits or local areas from adopting various design choices for their local streets, the federal approach to automated vehicles should be equally permissive. Local decision-makers should be granted the opportunity to guide the testing and adoption of automated vehicles in a way that makes the most sense for their community and region.

Considering the role of regions

We encourage U.S. DOT to more broadly consider the role regional planning organizations will play in the integration of automated vehicles into the transportation system. We are heartened by the nod to the challenges automation will pose to long-term transportation planning, and encourage U.S. DOT to go further with this consideration. Regional organizations, such as MPOs, Councils of Governments (COGs), and even rural transportation planning organizations (RTPOs), should be more robustly included in future guidance and policies. These organizations play a variety of essential roles: increasing stakeholder engagement and acceptance of automated technology; building consensus about land-use policies; facilitating data management and sharing; considering equitable access; workforce development; and more.

Further, we enthusiastically support the development of scenarios to assist planners with the high level of uncertainty raised by automation. Scenario planning is a powerful tool in cases where uncertainty is significant, and its use can help better explain the trade-offs of policy decisions to decision-makers and the public. An early and ongoing development of planning scenarios will go a long way to help States and localities better understand what automated vehicles could mean for their transportation system and how to maximize desired outcomes while minimizing negative effects.

To maximize the efficacy of these efforts, MPOs and other regional organizations will require additional funding and other resources. Increased funding will also be important to accommodate the changes to the planning process that automated vehicles will demand. Appropriately considering the near- and long-term impacts of AVs on a region's transportation system is likely to require new models and modeling techniques. Many regional organizations, especially in the largest metropolitan areas, have already invested resources to consider how to best approach these issues within their own regions. These considerations will be important everywhere but will demand more funding, especially to engage organizations in smaller metropolitan and rural areas.

A related area where U.S. DOT can plan an important role is helping MPOs identify the most appropriate investments within their regions to facilitate the integration of automated vehicles. Since MPOs have a role in the distribution of some federal funding at the local level, the earlier they understand where investments are needed, the faster they can prepare their regions appropriately. Though the uncertainty is high at present, this should be the consideration of future guidance as the picture begins to clear.

Data needs and opportunities

AV 3.0 primarily recognizes the opportunity to facilitate data sharing that will help automated vehicles. We encourage additional focus on how state and local agencies and industry may work together for additional public benefit. Regional organizations can play an important role in facilitating the regional sharing, storage, and use of data; assist local governments with the development of data sharing agreements; help establish appropriate standards for data privacy and cybersecurity; and may even help, where appropriate, develop revenue-generating strategies.

Relatedly, we encourage more guidance – and possibly additional regulation – from U.S. DOT about the massive quantity of data that will be produced by automated vehicles, connected

vehicles, and other sources. Current legislation and regulations are not enough to provide adequate understand regarding data collection, ownership, sharing, and monetization. Additionally, we encourage U.S. DOT to continue developing the considerations in AV 3.0 regarding transportation sector cybersecurity; and consideration of the privacy concerns that will undoubtedly be raised by increased public use of automated vehicles also require significantly more consideration than what is contained in AV 3.0.

Finally, we encourage specific consideration of data sharing to provide regional planning organizations with the specific types of data (origin-destination, for example) that can improve system modeling and planning, asset management, and safety. These and other specifically identified public-use cases should be considered and methods developed as early as possible to facilitate planning generally and planning for automated vehicles specifically.

Thank you for the opportunity to comment on AV 3.0. If you have any questions, please contact Erich Zimmermann, Deputy Director, at (202) 618-5697.

Sincerely,

A handwritten signature in cursive script that reads "Leslie Wollack". The signature is written in a light grey color and is positioned above the typed name and title.

Leslie Wollack
Deputy Director