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SCHOOL OF LAW

UNIVERSITY *of* WASHINGTON



HB 2970

Establishing an autonomous
vehicle work group.

**Technology Law
&
Public Policy Clinic**

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**What is an
Autonomous
Commercial
Vehicle?**

The image shows the driver's perspective from inside a vehicle. The steering wheel is on the left, featuring a red and white logo. The dashboard is equipped with a central infotainment screen, several analog gauges, and various control buttons. A yellow emergency stop button is visible on the dashboard. The view through the windshield shows a two-lane road curving to the right, bordered by dry grass and trees under a clear sky. A semi-transparent grey bar with white text is overlaid across the middle of the image.

To bring AI-enabled autonomous driving

Florida

\$90 million test track being built 40 miles SW of Orlando

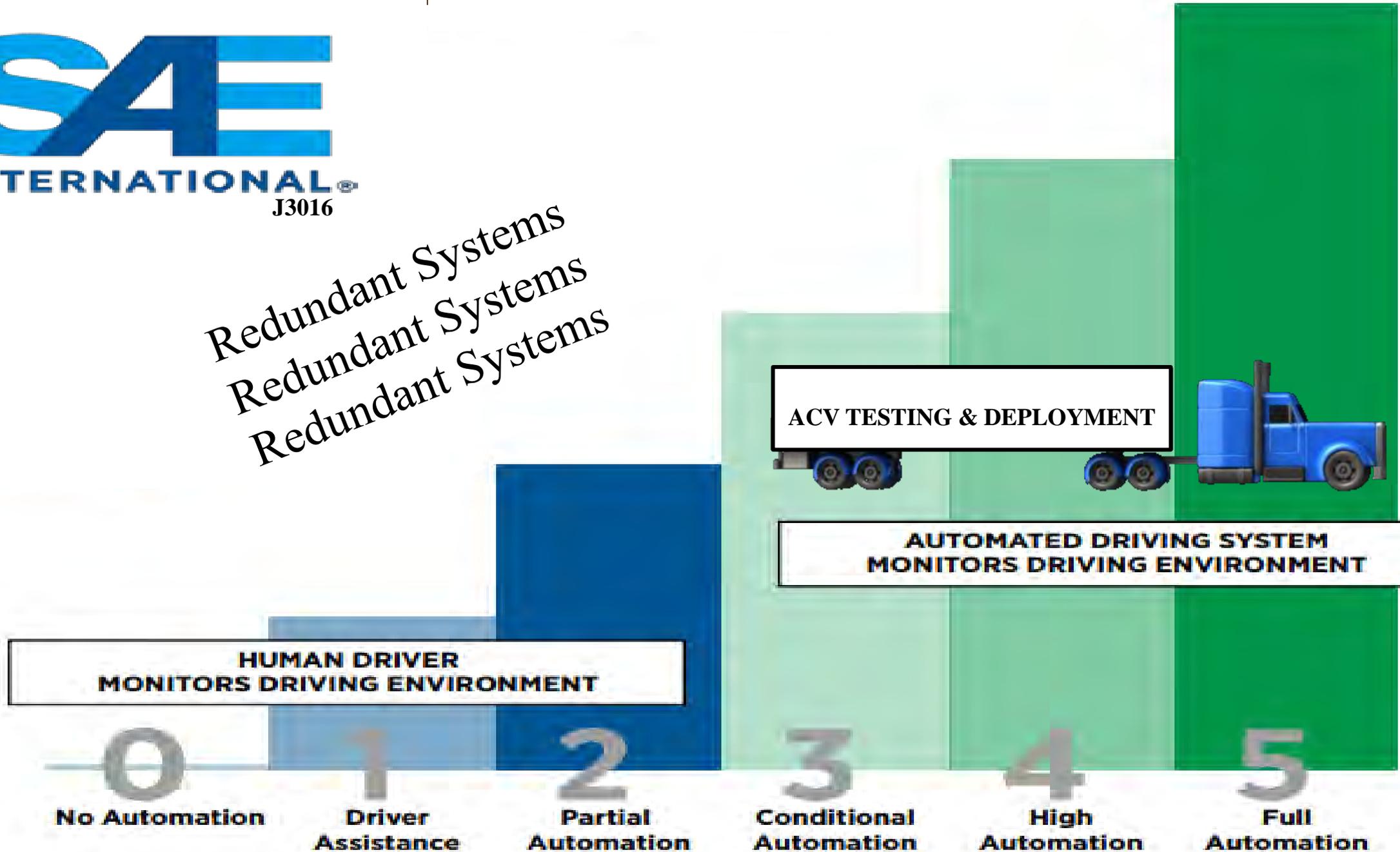


Mcity

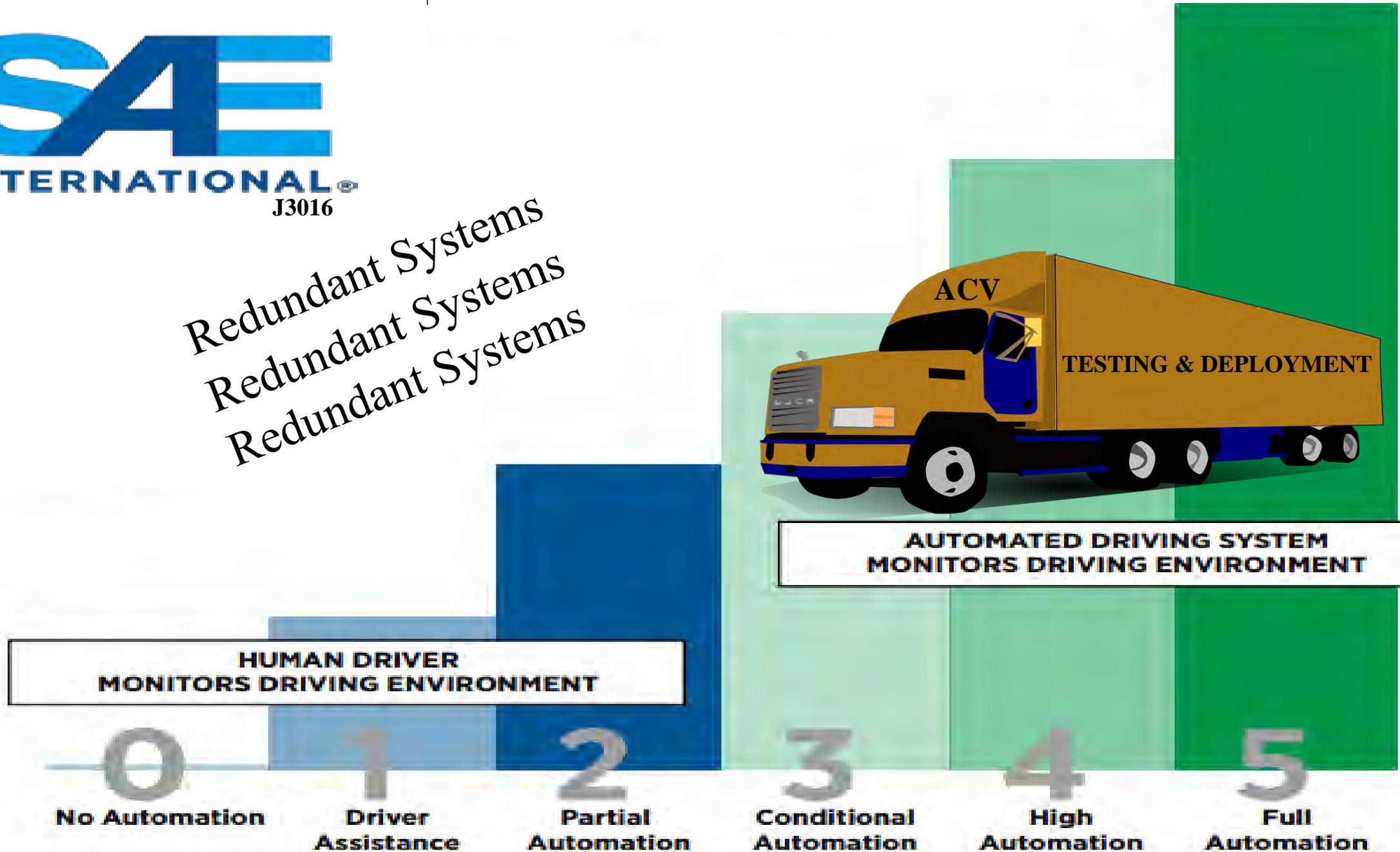
42 Companies Invest \$150,000 Each



Redundant Systems
Redundant Systems
Redundant Systems



Redundant Systems
Redundant Systems
Redundant Systems



**HUMAN DRIVER
MONITORS DRIVING ENVIRONMENT**

**AUTOMATED DRIVING SYSTEM
MONITORS DRIVING ENVIRONMENT**

0
No Automation

1
Driver Assistance

2
Partial Automation

3
Conditional Automation

4
High Automation

5
Full Automation

ACV

TESTING & DEPLOYMENT

Improve safety.

Aerodynamic drag around 26%

At the right distance can consume up to 15% less fuel.

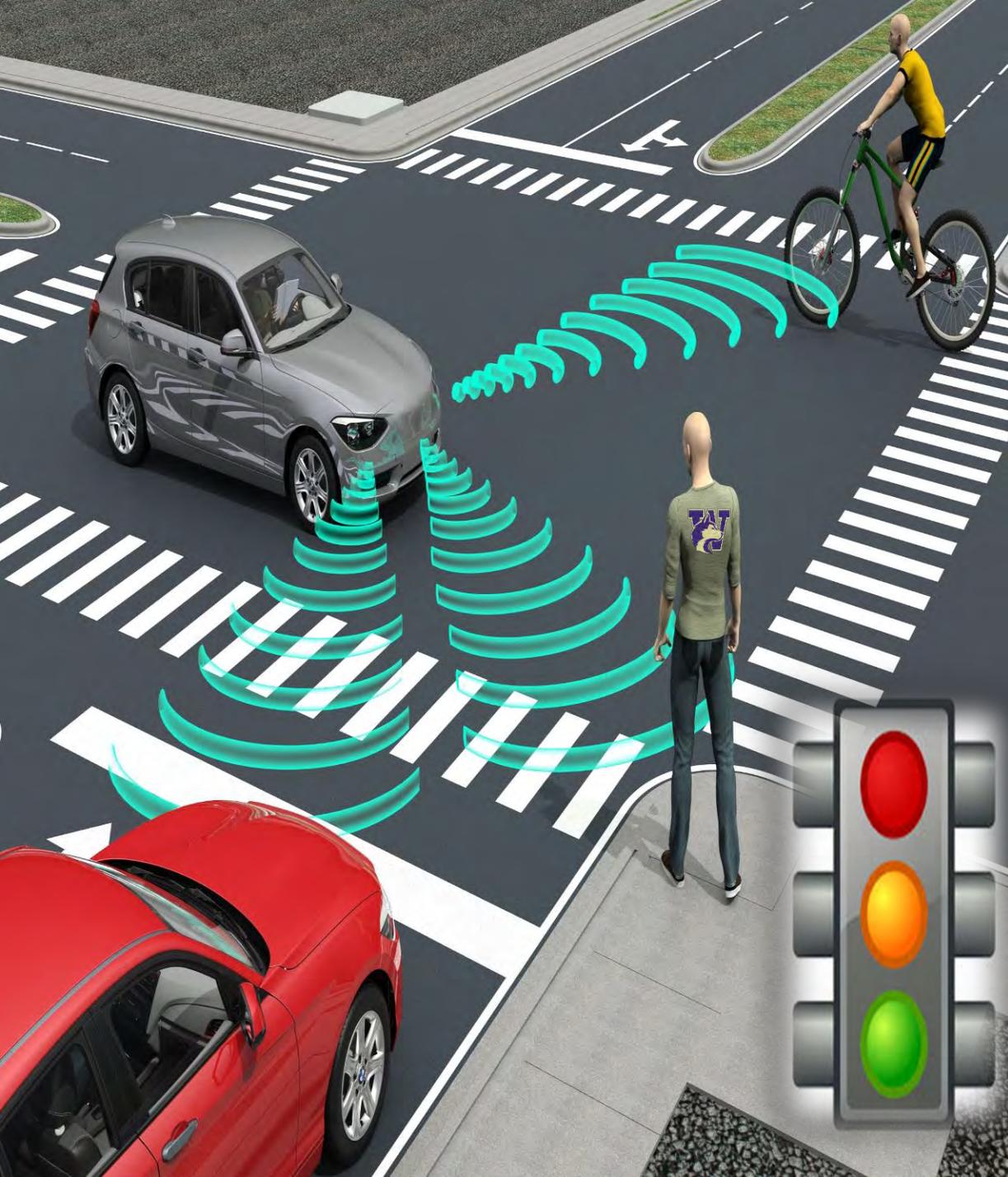
LEAD

PLATOONING





Highway Infrastructure



WELCOME
TO
WASHINGTON
THE EVERGREEN STATE

Autonomous



Collison Factors



INVOLVED VEHICLE TYPE	Total Vehicles in Collisions	Fatal Collisions	Serious Injury Collisions	Minor Injury Collisions	Property Damage Only Collisions	Unknown Injury Collision
Passenger Vehicles	195,195	641	2,094	61,601	128,225	2,634
Commercial Vehicles / Heavy Trucks	6,091	38	85	1,352	4,565	51
Motorcycles	2,440	76	406	1,562	365	31
Buses	625	2	8	177	437	1
Others	685	12	40	237	385	11
Unknown	5,408	8	26	706	4,219	449



2015: CLAS (WSDOT) and FARS (WTSC)

FMCSA is reconsidering its previous stance that a driver is required behind the wheel of a commercial vehicle at all times. **FMCSA can:**

- ✓ Grant waivers to applicants up to three (3) months.
- ✓ Exemptions up to five (5) years; or
- ✓ Allow pilot programs for up to three (3) years.



To allow the operation of commercial vehicles without a driver in the driver's seat.

F M C S A
Federal Motor Carrier Safety Administration

Wants to hear from the public on how ADS-equipped trucks could interact with the following existing regulations:

- ✓ Inspection, repair and maintenance
- ✓ Roadside and Annual Inspections
- ✓ Distracted driving and driver monitoring
- ✓ Medical Qualifications | Hours-of-Service
- ✓ CDL Endorsements | Data sharing
- ✓ The Compliance Program

COMPLIANCE/REGULATIONS



F M C S A
Federal Motor Carrier Safety Administration

1. Shipper and Insurer Briefing Addendum
2. Data: Information for Shippers, Brokers, and Insurers
3. Just the Facts About SMS

“The agency has told the public to no longer rely on FMCSA safety ratings as they are only a snapshot in time, and that even a satisfactory rating "does not mean a carrier is currently in compliance and operating safely.”

Recommendation: Reassess commercial shipper responsibilities in hiring drivers.

California

Colorado

Florida

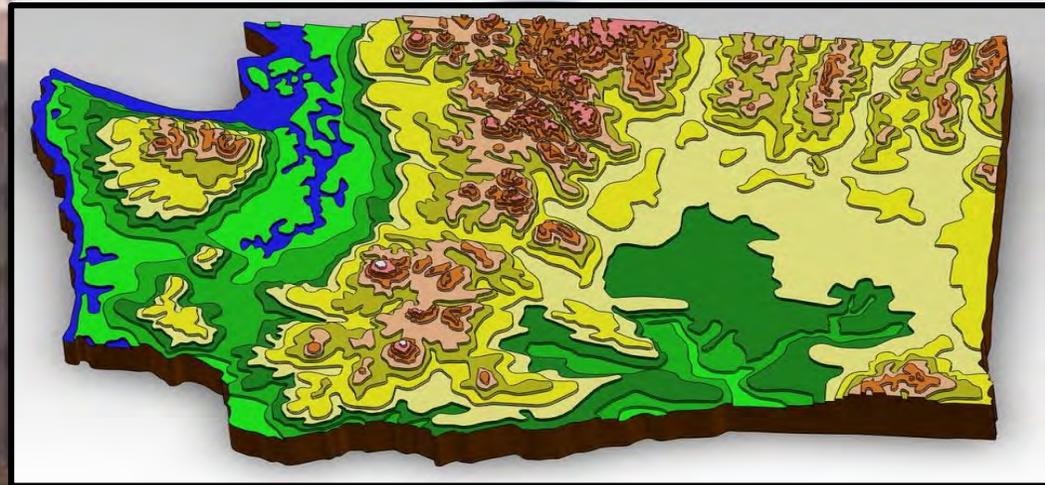
Nevada & Michigan



\$5,000,000 Limit

ALL RISK PERIL

INSURANCE REQUIREMENTS



RECOMMEND: WA adopts a \$5,000,000 limit all risk peril for third-party service providers.

California

Florida

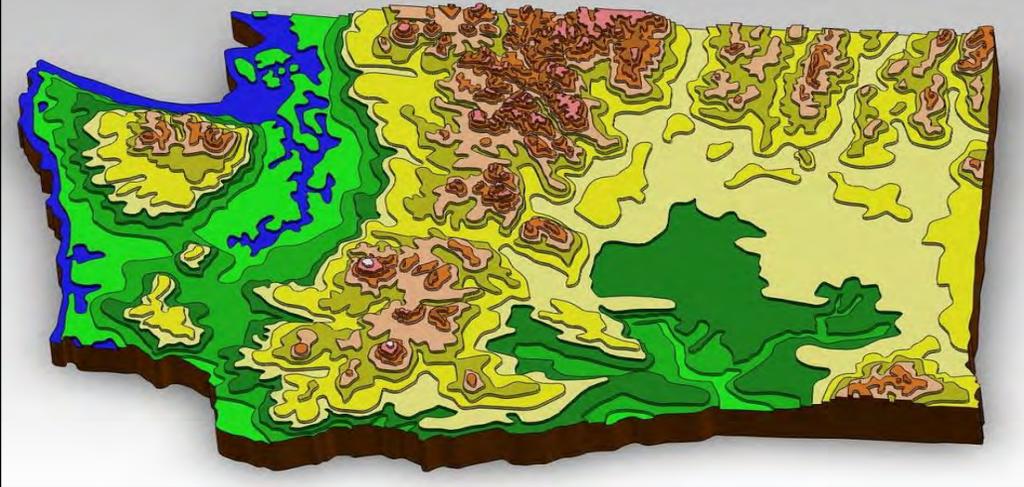
Nevada

Michigan &

Washington D. C.



STRICT | REASSESSING LIABILITY



Trucks and Trailers | Shippers | Cargo | Third-Party Vendors | Manufactures | Cybersecurity

RECOMMEND: Reassessing the due diligence requirements: Insurer's, Insurance Agents & Insurance Brokers.

How data will be utilized?

What needs to be addressed?



California regulations are some of the first rules in the nation to address the collection of *personal data*, as well as a requirement that vehicles meeting industry standards for *cybersecurity* such as:

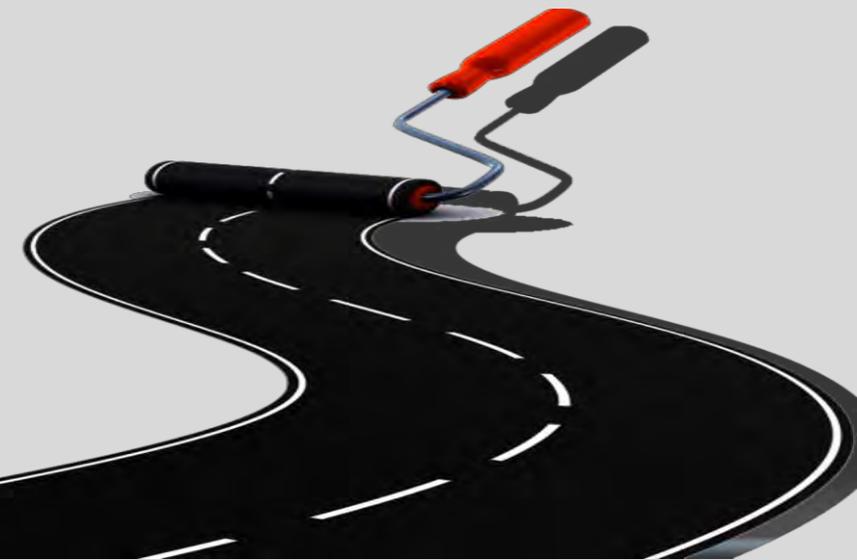
- ✓ **Implement a formal IS governance approach**
- ✓ **Detect insider threat**
- ✓ **Update software and systems**

CA regulations also included some of the first explicit restrictions on the collection and use of *personal information* in the autonomous-vehicle context.

Personal Information: CCR 227.02(1).

Manufacturer Disclosure to a Passenger: CCR 227.38(h).

Manufacturer Obligation Deployment: CCR 228.24(a).1



ESTABLISHING ACV LICENSING

✓ Rollover existing motor carrier regulations that apply to motor carrier authority to operate intrastate and interstate and apply to ACV testing authority guidelines.

✓ Select a state agency or private party that will test all ACV software and equipment prior to the approval of testing authority.

✓ Proof of accident reporting, compliance, and safety action plan.



Who can apply for Testing & Deployment?



- ✓ *Authorized commercial motor carriers* (for hire and private) cargo, passengers, household goods and solid waste collection companies.
- ✓ *Authorized motor carriers* operated by the state, military and federal government.
- ✓ *Authorized manufactures* of autonomous commercial vehicles.
- ✓ *Authorized third-party vendors* who are licensed to perform maintenance, installation and compliance services.

STEP ONE

Apply for
operating
authority:

- ✓ Business Info.
- ✓ USDOT #
- ✓ Proof of Insurance

STEP TWO

Go through
required testing:
meet or surpass
ACV testing
standards.

STEP THREE

Issuance of
permission to test
and or
deployment.

Apply Now

Ctrl



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Q A
Answer

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