



April 17, 2024

Senator Dave Cortese
Chair, Senate Transportation Committee
State Capitol, Room 405
Sacramento, California 95814

RE: Senate Bill 915 (Cortese, 2024): OPPOSE

Dear Chair Durazo:

The undersigned organizations write to express strong opposition to SB 915, which would require an “autonomous vehicle service” that has been already approved by the California DMV and CPUC to obtain additional authorization pursuant to a local ordinance to be established by each municipality in which the autonomous vehicles (“AV”) operate. In doing so, SB 915 would immediately ban AV commercial deployment unless and until cities create local ordinances in the

manner prescribed by SB 915—which most cities will be unable or unlikely to do given the resources and expertise required to implement such an ordinance.

Autonomous vehicles are making our roads safer, boosting supply chain efficiency, and creating new, high-quality career opportunities for California workers. As explained further below, SB 915 would undermine the ability of California’s state authorities to regulate AVs, while adding no benefit to safety and undermining accessibility for Californians.

SB 915 would not increase safety on California roads. The National Highway Traffic Safety Administration (“NHTSA”) estimates that nearly 43,000 traffic deaths occurred in 2022—approximately 100 fatalities per day. In California alone, more than 4,400 lives were lost in motor vehicle crashes in 2022. SB 915 would create a roadblock to transformational technology that will improve the unacceptable safety status quo by creating an additional barrier to entry *unrelated to safety*, placing cities in the position of picking winners and losers irrespective of the safety determinations made by California’s expert regulators. SB 915 is akin to requiring Californians to obtain a separate driver’s license for every one of California’s 520 cities after already receiving a license from the DMV. Moreover, SB 915 could actually undermine the safety of AVs, such as by requiring local ordinances to establish “an interoperability or override system accessible by first responders in the case of an emergency.” Such an override system, even if intended for the exclusive use by first responders, effectively mandates the creation of an entry point for malicious actors to seize control of critical vehicle systems.

SB 915 would nullify the decisions of California’s experienced state regulators. Under California’s comprehensive statutory and regulatory AV frameworks, the Department of Motor Vehicles (“DMV”) has established robust regulations for the testing and deployment of AVs, imposing a range of obligations, including incident reporting requirements. The DMV issues permits to AV companies based on the agency’s experience regulating vehicle safety and operation, and the Department has authority to suspend and revoke such permits upon determining an AV is not safe for operation on public roads. Moreover, the California Public Utilities Commission (“CPUC”) has established an additional layer of regulatory requirements for AV passenger services pursuant to its authority to regulate transportation network companies (“TNCs”). The CPUC has established four AV programs that, among other obligations, require AV passenger services to submit passenger safety plans and extensive trip-level information as part of their authorizations. These state regulatory frameworks are designed to adapt to the AV industry as it matures, and processes to establish and update the respective rules for AVs provide significant opportunities for public participation. SB 915 would throw away the decade of experience these agencies have spent regulating AVs by preventing an AV service that has been approved by the DMV and CPUC from operating in a city without an ordinance that meets SB 915’s requirements.

SB 915 would prevent unified AV operations and block mobility options for Californians.

Because no city currently has an AV permit program in place, the enactment of SB 915 would immediately prohibit AV commercial operations statewide. This ban would not be lifted unless cities establish the ordinance required by SB 915, but the vast majority of cities would be unlikely to enact and manage their own permit programs due to resource constraints and the technical expertise needed to do so. Accordingly, AV technology would remain effectively banned throughout most of the state for years to come. Any permit programs that are created will impose inconsistent requirements. At best, SB 915 threatens to create a small patchwork of local ordinances that blocks mobility options for all Californians. Those who stand to benefit the most from expanded AV services—including residents with disabilities, the elderly, those living in food and transit deserts, small businesses, farmers, and manufacturers needing to move goods—will not see the technology’s benefits unless their local government (1) decides to authorize AV services; and (2) establishes a local ordinance that meets the specific requirements of SB 915. Even if these requirements are met, the local ordinance may effectively bar AVs from operating in that jurisdiction either because they are inconsistent with neighboring jurisdictions or unnecessarily restrictive.

Additionally, even with a patchwork of local ordinances, companies approved to operate in California would be able to scale operations in only a few cities, and they would be further discouraged from investing the considerable time and resources needed to comply with potentially inconsistent requirements.

Impeding AV operations would have a disproportionately negative effect on California residents with mobility challenges. The U.S. Department of Transportation estimates that some 25.5 million Americans have travel-limiting disabilities,¹ with another study finding that roughly 560,000 people with disabilities never leave their homes due to transportation difficulties.² Often these difficulties stem from a lack of accessible or convenient public transportation or an inability to operate their own vehicle, as is the case for the over 7.8 million Americans reported to have a visual disability.³ The lack of transportation access can translate to having trouble getting and keeping a job—only 17.5% of people with disabilities are employed, compared to 65% of people without a disability.⁴ Fortunately, AVs are well positioned to expand access to the world for millions of Americans with mobility challenges, including residents across California. AVs, operating on their own or as part of existing paratransit programs, will allow individuals with disabilities to access resources and jobs with greater ease, reaping economic and social

¹ U.S. Dep’t of Transp., *Accessibility*, (July 29, 2020) <https://www.transportation.gov/accessibility>.

² Bureau of Transp. Stat., *Transportation Difficulties Keep Over Half a Million Disabled at Home* (Nov. 21, 2012), https://www.bts.gov/archive/publications/special_reports_and_issue_briefs/issue_briefs/number_03/entire

³ *Blindness Statistics*, National Federation of the Blind, <https://nfb.org/resources/blindness-statistics> (last visited February 7, 2024).

⁴ Economic News Release, U.S. Bureau of Labor Stat., *Persons with a Disability: Labor Force Characteristics Summary*(Feb. 24, 2021), <https://www.bls.gov/news.release/disabl.nr0.htm>.

benefits that were previously hard to achieve. However, cross-jurisdiction operation is foundational to AVs being able to provide such benefits.

AVs will create new, high-quality jobs while avoiding displacement of current drivers. In addition to enhancing safety on our roadways and increasing mobility, the AV industry is currently leveraging the existing workforce to create new roles for all education and skill levels. Many of the jobs created do not require a college degree, such as service technicians, remote assistance operators, mapping data collectors, delivery packers, and more. According to one study, the wider deployment of AVs can create over seven million new jobs by 2035, all while expanding access to affordable delivery services.⁵ In particular, those with experience in the trucking industry, particularly as truck drivers, will continue to offer valuable skills to AV trucking employers. California's truck drivers and autonomous truck drivers will coexist and thrive together. According to federal government data, the U.S. must move 50% more freight by 2050. That is happening against a backdrop of a severe truck driver shortage of 78,000 that is estimated to double by 2031. California must find a way to move *more* freight with *fewer* people to do it, and autonomous trucks are one of the potential solutions to this challenge that will exist along with truck drivers.

Autonomous vehicle services will usher in a new era of mobility that makes California's transportation system safer, more efficient, and more accessible. We strongly believe California should continue to support safety-enhancing policies without foreclosing a future with autonomous vehicles. For the reasons described above, we respectfully strongly oppose SB 915.

Sincerely,

Autonomous Vehicle Industry Association (AVIA)
ACES Mobility Coalition
Alliance for Automotive Innovation
Aurora
AUVSI
Bay Area Council
California Alliance for Freight Innovation
California Chamber of Commerce
California Delivery Association
California Hispanic Chambers of Commerce
California Manufacturers & Technology Association (CMTA)
California Asian Pacific Chamber of Commerce
Central City Association of Los Angeles

⁵ STEER, ECONOMIC IMPACTS OF AUTONOMOUS DELIVERY SERVICES IN THE U.S. xi (2020), https://www.steergroup.com/sites/default/files/2020-09/200910_%20Nuro_Final_Report_Public.pdf.

Central Valley Yemen Society
Chamber of Progress
Chamber San Mateo County
Coalition of California Chambers – Orange County
Coalition of Small & Disabled Veteran Businesses
Consumer Technology Association
Daimler Truck North America
Drew Boyles, Mayor, City of El Segundo
Einride
Endless Pursuit Corporation
Family Business Association of California
Flasher Barricade Association
Foster City Chamber of Commerce
Gatik
Inland Empire Economic Partnership
Kodiak
Latin Business Association (LBA)
Los Angeles County Business Federation (BizFed)
Luminar
MEMA, The Vehicle Suppliers Association
Motional
Mountain View Chamber of Commerce
National Federation of Independent Business (NFIB) - California
National Federation of the Blind
National Federation of the Blind - California
Navistar, Inc.
Nuro
Orange County Business Council
Palo Alto Chamber of Commerce
Plus AI
Relles Florist
San Francisco Chamber of Commerce
San Juan Capistrano Chamber of Commerce
San Mateo Chamber of Commerce
San Mateo County Economic Development Association
Santa Monica Chamber of Commerce
SAVE Coalition
Si Se Puede! Fresno County
Si Se Puede! Kern County
Si Se Puede! Kings County

Si Se Puede! Tulare County
Spartan Radar
Stack AV
Star Milling Co
Steve McShane, City Councilman, City of Salinas
Silicon Valley Leadership Group (SVLG)
TechNet
Tesla
Torc Robotics
Town of Danville
Uber
United Spinal Association
Valley Industry & Commerce Association (VICA)
Volvo Autonomous Solutions
Volvo Group North America
Waabi Innovation
Waymo
World Blind Union
Zoox