



FILED
04/26/18
04:59 PM

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on Regulations
Relating to Passenger Carriers, Ridesharing, and
New Online-Enabled Transportation Services

R.12-12-011
(Filed December 20, 2012)

**MOTION ALLIANCE OF AUTOMOBILE MANUFACTURER REQUESTING PARTY
STATUS**

In accordance with the provisions of 1.4(a)(4) of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), Alliance of Automobile Manufacturers ("Auto Alliance") respectfully moves for party status in the Commission's *Order Instituting Regulations Relating to Passenger Carriers, Ridesharing, and Online-Enabled Transportation Services* (R. 12-12-011) as it relates to the Commission's *Decision Authorizing Autonomous Vehicle Passenger Service with Drivers and Addressing in Part Issues Raised in the Petitions for Modification of General Motors, LLC, IGM Cruise, LLC, Lyft, Inc., and Rasier-CA, LLC, IUATC, LLC for Purposes of a Pilot Test Program for Driverless Autonomous Vehicle Passenger Service* (the "PD").

I. INTRODUCTION

The Auto Alliance (Alliance of Automobile Manufacturers) is committed to developing and implementing constructive solutions to public policy challenges that promote sustainable mobility and benefit society in the areas of environment, energy and motor vehicle safety.

The Auto Alliance, the leading advocacy group for the auto industry, represents 70% of all car and light truck sales in the United States, including the BMW Group, Fiat Chrysler Automobiles, Ford Motor Company, General Motors Company, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche, Toyota, Volkswagen Group of America and Volvo Car USA. Headquartered in Washington, DC, the Alliance also has offices in Sacramento, California and Detroit, Michigan.

II. INTEREST IN THIS PROCEEDING

On behalf of the members of the Alliance of Automobile Manufacturers, Inc. ("Alliance"), this responds to the California Public Utilities Commission (the "Commission") proposed decision regarding pilot test programs for automated driving systems ("ADS")-equipped vehicle passenger service with and without a human driver located in the vehicle.

ADS-equipped vehicles and related safety technologies have the potential to significantly improve overall safety on our nation's roadways. In 2016, 37,461 fatalities occurred in the United States due to vehicle crashes. This is a 5.6 percent (5.6%) increase from 2015. Given that 94 percent (94%) of vehicles crashes are caused by human error, ADS-equipped vehicles have a great potential to reduce roadway fatalities, injuries and property damage, because they can be reliably programmed to avoid most human driver

errors. Additionally, ADS-equipped vehicles hold the promise to provide numerous economic and societal benefits, such as decreased congestion and fuel consumption, and increased mobility for the elderly and disabled.

Our industry has been working closely with the California DMV for years to ensure an appropriately rigorous testing and deployment regulation. We have worked to share data and information to help inform the DMV on technical feasibility, future product opportunities and potential business plans. Therefore, we urge that the DMV continue to take the lead in regulating this space and that California avoid redundant - and potentially inconsistent - additional rules for driverless pilot programs.

Overall, we believe that ADS-equipped vehicles should be treated no differently than conventional vehicles regarding the ridesharing services they may provide. The DMV's permitting process for test and deployed ADS-equipped vehicles is very comprehensive and provides multiple mechanisms for the DMV to evaluate the safety of ADS-equipped vehicle operation in California.

The Alliance appreciates this opportunity to share its comments, and look forward to any follow-up with the Commission.

III. NOTICES

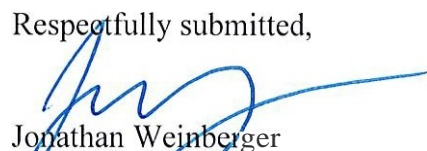
Service of notices, orders, and other correspondence in this proceeding should be directed to the Auto Alliance at the address set forth below:

Jonathan Weinberger
Alliance of Automobile Manufacturers
803 7th Street, NW
Suite 300
Washington, DC 20001
(202) 326-5500
jweinberger@autoalliance.org

IV. **CONCLUSION**

The Auto Alliance ' s participation in this proceeding will not prejudice any party and will not delay the Schedule or broaden the scope of this proceeding. For the reasons stated above, the Auto Alliance respectfully moves for a ruling that this motion for party status should be granted and the Commissioner's Docket Office should be directed to accept the Auto Alliance ' s Comments for filing.

Respectfully submitted,



Jonathan Weinberger
Alliance a omobile Manufacturers
803 7th Street, NW
Suite 300
Washington, DC 20001
(202) 326-5500
jweinberger@autoalliance.org

Dated: April 26, 2018 in Washington, DC.