



American Association of Motor Vehicle Administrators

June 26, 2020

The Honorable Frank Pallone, Jr.  
Chair  
House Committee on Energy and Commerce

The Honorable Greg Walden  
Ranking Member  
House Committee on Energy and Commerce

The Honorable Jan Schakowsky  
Chair  
Subcommittee on Consumer Protection and Commerce

The Honorable Cathy McMorris Rodgers  
Ranking Member  
Subcommittee on Consumer Protection and Commerce

Dear Chair Pallone, Ranking Member Walden, Chair Schakowsky, and Ranking Member McMorris Rodgers:

On behalf of the nation’s state and local government elected and appointed officials, we appreciate the outreach and engagement you have provided over the past nine months regarding federal legislation on autonomous vehicles (AVs). We are especially grateful for your commitment to a fresh review concerning the many policy issues applicable to AVs that have undergone further examination and understanding throughout the 116th Congress.

Through hearings, public comment opportunities and meetings with committee staff, our organizations have consistently identified that it is of the utmost importance to set aside provisions for any additional federal preemption of state and local authorities, which we believe is both unnecessary and unjustified at this time. We applaud the decision to not include such language in the Moving Forward Act and urge Congress to continue to refrain from imposing new preemptions in this area.

The regulation of motor vehicle safety, in the traditional manner (as defined in Title 49 Sections 30102 and 30111, which includes the design, construction and performance of a motor vehicle) is, and should remain, a federal obligation. However, state and local governments are the primary authority concerning operational safety, including regulating the operation of motor vehicles after such vehicles have been constructed, the operators of those motor vehicles, as well as establishing the rules of the road and traffic laws for how motor vehicles can be safely operated

on public roadways. For example, the federal government can require that a vehicle be able to properly identify and observe a stop sign, but the sole authority to establish laws requiring observation of such stop sign, and the enforcement thereof will continue to reside with state and local authorities, who are best suited to respond to local needs.

We firmly believe state and local governments are crucial to the safe adoption of AVs into our existing transportation networks with other transportation modes and users and that we must approach these issues in a systematic and pragmatic manner to ensure that safety on our nation's roadways and streets is paramount.

National Conference of State Legislatures

National League of Cities

The United States Conference of Mayors

National Association of Counties

American Association of State Highway and Transportation Officials

Governors Highway Safety Association

American Association of Motor Vehicle Administrators