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ASSOCIATION

July 16, 2019

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The Honorable Heidi King  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue S.E.  
Washington, DC 20590

**RE: NHTSA-2019-0036**

Dear Deputy Administrator King:

On behalf of the more than 1,500-member organizations of the American Public Transportation Association (APTA), I write to request a 60-day extension of the comment for the National Highway Traffic Safety Administration's (NHTSA) advance notice of proposed rulemaking regarding removing regulatory barriers for vehicles with automated driving systems published in the *Federal Register* on May 28, 2019.

**About APTA**

The American Public Transportation Association is a nonprofit international association of 1,500 public and private sector organization which represent a \$71 billion industry that directly employs 430,000 people and supports millions of private sector jobs. APTA members are engaged in the areas of bus, paratransit, light rail, commuter rail, subways, waterborne services, and intercity and high-speed passenger rail. This includes: transit systems; planning, design, construction, and finance firms; product and service providers; academic institutions; transit associations and state departments of transportation. APTA is the only association in North America that represents all modes of public transportation. APTA members serve the public interest by providing safe, efficient and economical transit services and products.

**Request for Extension of Comment Period**

While APTA members are extremely appreciative of the Department's and NHTSA's efforts to address the challenges of incorporating autonomous technology into vehicles, APTA requests an extension of the comment period for

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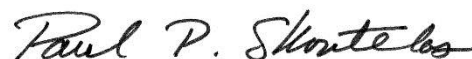
60 days. An extension allows for a more thorough, careful review of the close to 40 highly technical questions posed by NHTSA. In reviewing the questions, it quickly became clear to our transit system members that the information requested would be best answered by engineers from original equipment manufacturers (“OEM”). In fact, we have heard from our OEM members that they are struggling to answer some of the questions included in the ANPRM. We recognize that transit systems will play a vital role in testing, demonstrating, and piloting this technology, which necessitates including these entities in the development of any regulatory policies and requirements. To that end, APTA respectfully suggests NHTSA hold a public meeting or webinar to go over the questions in the ANPRM in an open forum where OEMs and transit systems can gain a better understanding of NHTSA overall approach to this important endeavor. We would also appreciate a high-level meeting with NHTSA officials to discuss how APTA and its members can work collaboratively with NHTSA on this effort.

Further, as an overarching matter, APTA members would like to see NHTSA propose some methodology for collecting data from the various pilot and demonstration programs across the country. Our members believe that setting up a repository for such data will better inform any modifications to or proposals for regulatory requirements.

APTA believes this request for an extension of time, public hearing/webinar, and high-level meeting would facilitate our ability to seek comment from a wider range of APTA members potentially impacted by the proposal, and ensures that our comments are constructive, practical, and helpful to NHTSA.

We appreciate your consideration of this request. For additional information, please contact Linda Ford, APTA’s General Counsel, at (202) 496-4808 or [lford@apta.com](mailto:lford@apta.com).

Sincerely yours,



Paul P. Skoutelas  
President and CEO

Cc: Director David Hines  
Attorney-Advisor Sara Bennett