

**Joint Statement of
Ford Motor Company and ARGO AI**

**Commonwealth of Pennsylvania
House and Senate Committees on Transportation
Hearing on
“Highly Automated Vehicles Testing Legislation”**

March 21, 2017

Ford Motor Company and ARGO AI believe automated vehicles have significant potential to improve mobility and safety. Our companies are hard at work to achieve the goal of deploying a Society of Automotive Engineers (SAE) Level Four vehicle without a steering wheel or accelerator and brake pedals for commercial applications in geo-fenced areas in 2021. To that end, Ford recently announced it will invest \$1 billion over the next five years in ARGO AI, which will help build the virtual driver system for future Ford automated vehicles. Our partnership’s development work will continue in Pittsburgh, where ARGO was founded, but its viability there will hinge on having the right policies in place to facilitate, rather than impede, innovation.

We acknowledge the hard work the General Assembly, PennDOT, and other stakeholders have invested in producing SB 427. Nevertheless, we are quite concerned that the bill contemplates rather complex testing requirements and does not provide a clear path for automated vehicle deployment in the near term. In Ford’s and ARGO’s collective view, neither of these potential outcomes will produce an environment conducive to advancements in automated vehicles in the Commonwealth of Pennsylvania.

Ford and ARGO echo many of the concerns with SB 427 shared by others providing testimony. In particular, the bill employs unique definitions of automated vehicle-related terms rather than making use of those more widely accepted by SAE. Further, SB 427 – as mentioned – is limited to automated vehicle testing. The bill’s testing requirements are unduly restrictive (*e.g.*, requiring a human in the driver’s seat for Level Four vehicles and permitting PennDOT to set a cap on the number of permits issued in the first two years), are additionally burdened by an unclear application process, and do not appear to contemplate reasonable exceptions to federal and state laws. Finally, the SB 427 would grant wide-ranging authority to PennDOT to issue a statement of policy related to automated vehicles, which ultimately may result in additional regulatory mandates that could stymie the testing and deployment of automated vehicles.

While we appreciate the intention of certain sections of SB 427, such as its prohibition on local ordinances and consideration of reciprocal agreements with other jurisdictions, we regret that we cannot support the bill at this time. Ford and ARGO strongly believe that if the Commonwealth does pursue legislative or regulatory action with respect to automated vehicles, such action should be premised upon removing impediments to the safe testing and deployment of such vehicles. In closing, Ford and ARGO would be pleased to collaborate with the Commonwealth to that end and would welcome the opportunity to help craft reasonable policies to ensure a safe, competitive future for automated vehicles.