



January 5, 2018

The Honorable Phil Ting
Assemblymember, CA State Assembly
State Capitol, Room 6026
Sacramento, CA 95814

Re: Assembly Bill (AB) 87 – OPPOSE as amended January 3, 2018

Dear Assemblymember Ting,

We, the undersigned, representing the breadth and depth of the technology, innovation and communications industries, respectfully oppose your measure, AB 87. This bill would amend the current statutory provisions regarding the testing of autonomous vehicles.

Pursuant to SB 1298 (Padilla, 2012), the Department of Motor Vehicles (DMV) is currently closing out its long awaited comprehensive rulemaking related to the testing of autonomous vehicles, with a final vote expected this month. The regulations include detailed manufacturer notification requirements to local governments which, among other requirements, requires a manufacturer to list all the public roads in the jurisdiction where the vehicles will be tested and the days and times that testing will be conducted on public roads.

We agree with the author and the DMV that public safety is paramount when considering vehicle regulations, however we do not believe legislation parroting current regulatory language is necessary because the DMV regulations carry the same weight and force of law as statute. Furthermore, with such new regulations in this policy arena we believe it would be counter intuitive to tie the DMV's hands by codifying language which would essentially prevent them from improving or updating the rules in the future to address local or agency concerns either through the current rulemaking process or after more time and experience with the driverless testing regulations because it would require waiting for the legislature to act.

AB 87 is unnecessary and while well intentioned has the very real potential of impeding on the almost six years of efforts put forth by the DMV and stakeholders to adopt appropriate regulations guiding this industry. For the reasons, we respectfully **oppose AB 87**.

Sincerely,



Laura Bennett
Executive Director
TechNet



Amy Mmagu
Policy Advocate
California Chamber of Commerce



Bethanne Cooley
Senior Director, State Legislative Affairs
CTIA



Kelly Hitt
Director, State Government Affairs
CompTIA

cc: Assemblymember Jim Frazier, Chair, Assembly Transportation Committee
Assemblymember Miguel Santiago, Chair, Assembly Communications and
Conveyance Committee
Members, Assembly Transportation Committee
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Eric Thronson, Chief Consultant, Assembly Transportation Committee
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