

BMW Group

September 13, 2018

The Honorable John Thune, Chairman
Committee on Commerce, Science and Transportation
United States Senate
512 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Nelson, Ranking Member
Committee on Commerce, Science and Transportation
United States Senate
425 Hart Senate Office Building
Washington, DC 20510

The Honorable Gary Peters
United States Senate
724 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Thune, Ranking Member Nelson, and Senator Peters:

As VP Engineering of BMW of North America (BMW NA), I write to thank you and the co-sponsors of the AV START Act (S. 1885) for your leadership on this bill. I also write to ask that you and your colleagues in the Senate continue your determination to see that this legislation is acted upon by the full Senate.

While we are experiencing an evolution in mobility today, the real transformation is being researched, tested, and developed for tomorrow. As you are likely aware, the lifecycle for vehicle development — including safety systems, architecture, and drive systems — takes years to innovate and validate. For the proceeding decades in the auto industry, the regulatory and legal frameworks have, for the most part, worked well because the advances have been foreseeable within this framework. As we view tomorrow's possibilities from today's vantage point, however, the automotive development roadmap has materially changed.

The change is in large part due to the confluence of major advances in mobility, namely: automation, connectivity, shared mobility, and drivetrain electrification. These fascinating developments bring numerous opportunities, but they also demand new ways to approach existing requirements. If companies are to continue investing heavily in these revolutionary advances, a common understanding of a new framework is vital to ensure organizations are focusing on the right approaches. Absent clear federal and state roles for automated vehicle technologies and a level playing field with common rules for all stakeholders — experienced auto companies and new market entrants, alike — we as a nation are not creating the best foundation for success.

Roberto Rossetti
VP Engineering

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What does success look like? Fewer accidents, increased mobility, and more efficient travel to name a few benefits. This is also part of the point. It is not possible to list all of the benefits because we simply cannot know them yet, making the fit between revolutionary technologies and existing regulatory frameworks that much more challenging. What we do know is that a lack of clarity in federal and state responsibilities, an uneven playing field, and a hodgepodge of state laws does not lend itself to either promoting innovation or investment.

That said, this issue must not be limited to academic concepts. We all should continue to bear in mind that inaction is also a decision and carries its own consequences. Inaction is a vote for the status quo: 9 in 10 accidents on U.S. roads are the result of human behavior. This cannot possibly be acceptable by anyone's measure. Based on decades of engineering experience, BMW NA firmly believes that automated driving systems and connected car technologies will make a demonstrably positive impact on road safety.

The building blocks for highly automated vehicles and advanced connected car features are on roads today. Tomorrow's application of these technologies on roadways worldwide is a foregone conclusion. What remains to be decided is the role of the United States in future mobility. The choice is open as to whether or not the United States is determined to continue as a global center of dynamic innovation. As the largest vehicle exporter by value in the United States and after investing billions of dollars in this country over the last nearly half century, BMW NA certainly hopes so. This innovative dynamism is at the heart of why we feel so much at home here.

The AV START Act – and its companion bill in the House, the SELF DRIVE Act (H.R. 3388) – offers a pathway for the development and deployment of automated vehicle technologies. We kindly ask that this bill is given the due consideration it deserves.

Sincerely,



Roberto Rossetti
VP Engineering
BMW of North America, LLC

CC: The Honorable Mitch McConnell, Majority Leader
The Honorable Charles E. Schumer, Minority Leader
The Honorable Roy Blunt
The Honorable Debbie Stabenow
The Honorable Roger Wicker

