October 17, 2017

Jean Shiomoto, Director  
ATTN: Brian G. Soublet, Deputy Director/Chief Counsel  
Department of Motor Vehicles  
Legal Affairs Division  
P.O. Box 93282, MS C-244  
Sacramento, CA 94232-3820  
Via: LADRegulations@dmv.ca.gov

Re: Department of Motor Vehicles Proposed Driverless Testing and Deployment Regulations – Released October 11, 2017

Dear Director Shiomoto:

On behalf of the City of Beverly Hills, I write to you in SUPPORT of the current version of the Department of Motor Vehicles’ (DMV) Proposed Driverless Testing and Deployment Regulations, released on October 11, 2017.

The City of Beverly Hills has been on the forefront of supporting the development and testing of fully autonomous vehicles (AVs). Last year, the City of Beverly Hills passed a resolution regarding our long-term goal of developing an autonomous vehicle program to address “first and last mile” issues, increase mobility, relieve traffic congestion, improve parking, and create options for transporting senior citizens.

Our City staff have been working closely with both our state and federal lobbyists to consider legislation to promote autonomous vehicle development. The City has been a strong advocate for encouraging the testing and deployment of autonomous vehicles throughout California.
and the nation. It is our desire to see this technology advance quickly, yet safely, to benefit the community.

The revised regulations released by the DMV will allow for the testing of SAE Level 5 AVs without a driver in the vehicle. This provision ensures that the regulations reflect technological advancements and abilities of AVs. It also allows test vehicles to be operated at SAE Level 5 on public roads with no safety driver present in the vehicle.

Furthermore, the proposed regulations appropriately recognize that the federal government, through the National Highway Traffic Safety Administration (NHTSA), has the authority and responsibility to enforce motor vehicle safety standards. The revised version of the regulations reflects NHTSA’s recently released guidance on the testing and deployment of AVs.

The City appreciates the work that DMV has done to gather and incorporate appropriate stakeholder feedback. For these reasons, the City of Beverly Hills SUPPORTS the DMV’s Proposed Driverless Testing and Deployment Regulations, and we look forward to deploying this exciting technology in our City. Thank you for your efforts and your consideration.

Sincerely,

Lili Bosse
Mayor, City of Beverly Hills

Cc: The Honorable Ben Allen, 26th Senate District
    The Honorable Richard Bloom, 50th Assembly District
    Andrew K. Antwih, Shaw / Yoder / Antwih, Inc.