Dear Senator Murray,

The undersigned organizations, including state and local organizations representing bicyclists and pedestrians from all 50 states, national organizations, and professional associations, are writing to convey our opposition to S. 1885, the AV START Act in its current form. While we support the goal of interim frameworks for autonomous vehicles (AV) and believe that autonomous vehicles have the potential to increase safety for bicyclists and pedestrians by reducing distracted driving and speeding, we also believe that the current AV START Act does not include sufficient safeguards for bicyclists, pedestrians, wheelchair users, and others who may be in the roadway. Any regulatory framework should push automated driving systems to not just make incremental improvements in safety for drivers, but towards systemic change to eliminate the 36,000 fatalities each year on our roadways.

A 2017 article on the AV industry by IEEE Spectrum reported that detecting bicyclists is one of the most difficult problems automated driving systems face, and testing for bicyclists as well as improvements in detecting bicyclists lag behind other automated driving system technology tests. This lag is evident in testing of level two AVs in cities today. For instance, a survey by Bike Pittsburgh of its members who ride on streets with AVs received a number of comments on near-misses by autonomous vehicles not following the state’s four-foot safe passing law. Pennsylvania’s law is far from unique; 36 states have similar safe passing laws which require a driver to give a bicyclist several feet of clearance when overtaking the bicyclists.

It has also been reported that automated driving systems have trouble detecting a bicyclist stopped at a red light when that bicyclist is next to a parked car. This can lead to an extremely dangerous situation if the AV is planning a right turn while the bicyclist is continuing straight. In San Francisco, automated vehicles were found to engage in four of the five driver behaviors most likely to cause fatalities and injuries among bicyclists and pedestrians including: running red lights, rolling through stop signs, making dangerous right turns, and not yielding to pedestrians in crosswalks.
The AV START bill would allow each manufacturer of AVs to sell up to 80,000 vehicles to members of the public within three years, up from the 2,500 exemptions allowed today. While manufacturers are required to test these vehicle models for safety, the manufacturer sets the standards for the test, and the National Highway Safety Traffic Administration (NHTSA) cannot use the results of those safety tests to deny the manufacturer its ability to sell the vehicles. These vehicles would not be required to meet any performance standard that includes the ability to detect, recognize, anticipate, and respond to the movements of all transportation system users, including bicyclists and pedestrians – abilities that the U.S. Department of Transportation’s recently released AV 3.0 policy stated are needed in order to realize gains in transportation safety.

The undersigned organizations ask you to oppose the AV START Act unless and until the bill is amended to require that automated vehicles demonstrate they can ‘see’ and respond to people biking, walking, or using wheelchairs, as well as construction workers in work zones, first responders providing assistance, and police directing traffic. A ‘vision test’ will ensure that whatever risks are associated with AVs on our streets are not borne disproportionately by bicyclists, pedestrians, and other vulnerable road users. Please oppose the AV START Act until such assurances are in place.

Sincerely,

Alabama
Alabama Bicycle Coalition (AlaBike)
Baldwin County Trailblazers

Alaska
Walk Sitka

Arizona
El Grupo Youth Cycling

Arkansas
BikeNWA-Bike North West Arkansas
Conway Advocates for Bicycling

California
Bike Walk Alameda
California Bicycling Coalition
Climate Action Santa Monica
Fresno Cycling Club
San Francisco Bicycle Coalition
Santa Monica Safe Streets Alliance
Santa Monica Spoke

Colorado
Bicycle Colorado
Bike Colorado Springs
Bike Fort Collins

Connecticut
Pequot Cyclists

Delaware
Bike Delaware

District of Columbia
Washington Area Bicyclist Association

Florida
Dade Heritage Trust Inc.
Florida Bicycle Association
Gainesville Cycling Club
Naples Velo Bicycle Club
North Florida Bicycle Club
Sarasota Manatee Bicycle Club
Streets Alive of SWFL

Georgia
Atlanta Bicycle Coalition
Bike FAYETTE
BikeAthens
Conyers Rockdale Bicycle and Trail Coalition
Georgia Bikes
Wheel Movement of the CSRA

Hawaii
Hawaii Bicycling League
PATH~ Peoples Advocacy for Trails Hawaii

Idaho
Idaho Walk Bike Alliance
Illinois
Evanston Bicycle Club
Friends of Cycling in Elk Grove
McHenry County Bicycle Advocates
Ride Illinois
Starved Rock Cycling Association

Indiana
Bicycle Indiana, Inc.
Health by Design
J's Bikes Racing
National Road Bicycle Club

Iowa
Iowa Bicycle Coalition

Kansas
Adirondack Cycling Club
Americans For Older Driver Safety

Kentucky
Ashland Cycling Enthusiasts
Bluegrass Cycling Club

Louisiana
Bike Easy

Maine
Bicycle Coalition of Maine

Maryland
Bicycle Advocates for Annapolis & Anne Arundel County
Bike Maryland
Velo City Riders Cycling Club

Massachusetts
LivableStreets Alliance
MassBike
New Horizons Cycling Club

Michigan
Greater Grand Rapids Bicycle Coalition
League of Michigan Bicyclists

Minnesota
Bicycle Alliance of Minnesota

Mississippi
Bike Walk Mississippi

Missouri
Big Shark Bicycle Company
BikeWalkKC
Missouri Bicycle and Pedestrian Federation
St. Louis Bicycle Works

Montana
Bike Walk Montana
Climate Ride

Nebraska
Great Plains Bicycle Club
Nebraska Bicycling Alliance

Nevada
Green Valley Cyclists
The Southern Nevada Bicycle Coalition

New Hampshire
Bike-Walk Alliance of New Hampshire
Mount Washington Valley Cycling Club

New Jersey
Bicycle Touring Club of North Jersey
Bike Walk Morristown
New Jersey Bike & Walk Coalition
The Central Jersey Bicycle Club

New Mexico
Bicycle Coalition of New Mexico

New York
GObike Buffalo
Long Island Streets
New York Bicycle Coalition
Virtuous Bicycle

North Carolina
BeersNGears
Bicycling in Greensboro
Central Carolina Cycling Club
East Coast Greenway Alliance
Winston Salem Cycling Advocacy Network

North Dakota
North Dakota Active Transportation Alliance
Ohio
Bike Cleveland
Maumee Valley Adventurers
North Coast Multisports, Inc.
Ohio Bicycle Federation
Ohio Ride of Silence
Silver Wheels Cycling Club, Inc.
We Are Traffic
Western Reserve Wheelers

Oklahoma
Red Dirt Pedalers

Oregon
Gorge Pedal
WashCo Bikes

Pennsylvania
Berk County Bicycle Club
Bicycle Coalition of Greater Philadelphia
Bicycle South Central PA
Bike Pittsburgh
Lebanon Valley Bicycle Coalition

Rhode Island
Bike Newport

South Carolina
Freewheelers of Spartanburg
Palmetto Cycling Coalition
Sun City Cyclists Club

South Dakota
RASDak-Ride Across South Dakota

Tennessee
BLDG Memphis
Walk Bike Nashville

Texas
BikeTexas
Frisco Cycling Club

Utah
Bike Utah

Vermont
Local Motion
VBIke

Virginia
Richmond Virginia Area Bicycling Assn.
Shenandoah Valley Bicycle Coalition
Sports Backers
Virginia Bicycling Federation

Washington
Washington Bikes
West Sound Cycling Club

West Virginia
West Virginia Connecting Communities

Wisconsin
Down with Bikes
Madison Bikes

Wyoming
Wyoming Pathways

National Bicycling and Walking Advocacy Organizations
Adventure Cycling Association
America Walks
League of American Bicyclists
People for Bikes
Rails-to-Trails Conservancy
Ride of Silence
Safe Routes to School National Partnership

Professional Associations and Private Entities
Alta Planning and Design
American College of Sports Medicine
American Society for Landscape Architects
Association of Pedestrian and Bicycle Professionals
Planet Bike