

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 * Alta Planning and Design * American College of Sports Medicine * American Society for Landscape Architects * Association of Pedestrian and Bicycle Professionals * Planet Bike * Alabama Bicycle Coalition (AlaBike) * Baldwin County Trailblazers * Walk Sitka * El Grupo Youth Cycling * BikeNWA-Bike North West Arkansas * Conway Advocates for Bicycling * 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 * Bicycle Colorado * Bike Colorado Springs * Bike Fort Collins * Pequot Cyclists * Bike Delaware * Washington Area Bicyclist Association * 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 * Atlanta Bicycle Coalition * Bike FAYETTE * BikeAthens * Conyers Rockdale Bicycle and Trail Coalition * Georgia Bikes * Wheel Movement of the CSRA * Hawaii Bicycling League * PATH~ Peoples Advocacy for Trails Hawaii * Idaho Walk Bike Alliance * Evanston Bicycle Club * Friends of Cycling in Elk Grove * McHenry County Bicycle Advocates * Ride Illinois * Starved Rock Cycling Association * Bicycle Indiana, Inc. * Health by Design * J's Bikes Racing * National Road Bicycle Club * Iowa Bicycle Coalition * Adirondack Cycling Club * Americans For Older Driver Safety * Ashland Cycling Enthusiasts * Bluegrass Cycling Club * Bike Easy * Bicycle Coalition of Maine * Bicycle Advocates for Annapolis & Anne Arundel County * Bike Maryland * Velo City Riders Cycling Club * LivableStreets Alliance * MassBike * New Horizons Cycling Club * Greater Grand Rapids Bicycle Coalition * League of Michigan Bicyclists * Bicycle Alliance of Minnesota * Bike Walk Mississippi * Big Shark Bicycle Company * BikeWalkKC * Missouri Bicycle and Pedestrian Federation * St. Louis Bicycle Works * Bike Walk Montana * Climate Ride * Great Plains Bicycle Club * Nebraska Bicycling Alliance * Green Valley Cyclists * The Southern Nevada Bicycle Coalition * Bike-Walk Alliance of New Hampshire * Mount Washington Valley Cycling Club * Bicycle Touring Club of North Jersey * Bike Walk Morristown * New Jersey Bike & Walk Coalition * The Central Jersey Bicycle Club * Bicycle Coalition of New Mexico * GObike Buffalo * Long Island Streets * New York Bicycle Coalition * Virtuous Bicycle * BeersNGears * Bicycling in Greensboro * Central Carolina Cycling Club * East Coast Greenway Alliance * Winston Salem Cycling Advocacy Network * North Dakota Active Transportation Alliance * 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 * Red Dirt Pedalers * Gorge Pedal * WashCo Bikes * Berks County Bicycle Club * Bicycle Coalition of Greater Philadelphia * Bicycle South Central PA * Bike Pittsburgh * Lebanon Valley Bicycle Coalition * Bike Newport * Freewheelers of Spartanburg * Palmetto Cycling Coalition * Sun City Cyclers Club * RASDak-Ride Across South Dakota * BLDG Memphis * Walk Bike Nashville * BikeTexas * Frisco Cycling Club * Bike Utah * Local Motion * VBike * Richmond Virginia Area Bicycling Assn. * Shenandoah Valley Bicycle Coalition * Sports Backers * Virginia Bicycling Federation * Washington Bikes * West Sound Cycling Club * West Virginia Connecting Communities * Down with Bikes * Madison Bikes * Wyoming Pathways

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

Berks 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