



February 21, 2020
Via electronic mail

The Honorable Roger Wicker
United States Senate
555 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Frank Pallone, Jr.
United States House of Representatives
2107 Rayburn House Office Building
Washington, DC 20515

The Honorable Maria Cantwell
United States Senate
511 Hart Senate Office Building
Washington, DC 20510

The Honorable Greg Walden
United States House of Representatives
2185 Rayburn House Office Building
Washington, DC 20515

RE: Autonomous vehicles – request for feedback 3

Dear Chairmen Pallone and Wicker, Ranking Members Cantwell and Walden:

The Consortium of Citizens with Disabilities (CCD) Transportation Task Force is pleased to submit comments on these seven sections in the bicameral, bipartisan process to develop an autonomous vehicles bill. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society. During the autonomous vehicles hearing on February 11th, both witnesses and Members of Congress attested to the potential benefits of autonomous vehicles for people with disabilities. Below, we respond to three sections with that potential in mind. We are also attaching the Task Force's letter submitted on August 23, 2019, for further reference.

PAT 20127, Consumer Education

As consumers decide how and whether to use autonomous vehicles, they need to understand how the vehicles are accessible to, usable by, and safe for people with disabilities. Therefore, the Task Force recommends:

On page 2, line 3, after “software updates.”, insert “The consumer education provided by manufacturers shall include information about the vehicle’s accessibility and usability features for people with disabilities, including sensory, cognitive, and physical disabilities.”

PAT 20128, Personnel and Staffing



In order for autonomous vehicles to achieve the widely touted benefits for people with disabilities, accessibility and usability for people with disabilities must be considered throughout design, development, testing, certification, distribution, and use. As such, the Department of Transportation, especially the National Highway Traffic Safety Administration, should have ample expertise in accessibility and usability for people with disabilities. Therefore, the Task Force recommends:

On page 1, line 14, change “(4) any other area...” to “(5) any other area...” and insert prior to (5), “(4) accessibility, usability, and universal design for people with disabilities, including sensory, cognitive, and physical disabilities; and”

CYBER_01, Cybersecurity

People with disabilities have a special interest in the protection of their personal data, including health and disability status and location. The Task Force reiterates our concern that passengers’ health and disability status and locations visited must neither be shared nor used for commercial or tracking purposes without permission of the individual. Moreover, those privacy requirements must be enforced. We encourage the committees to address privacy separately; however, to the extent that cybersecurity impacts data privacy, the Task Force recommends:

On page 3, line 6, change “(11) considering consistency...” to “(12) considering consistency...” and insert prior to (12), “(11) policies for protecting personal consumer data, including, but not limited to, health or disability status and location data, and response to cybersecurity incidents involving inappropriate access to such data; and”

Additional Considerations

Finally, as you draft the final bill, we urge you to consider our recommendations and concerns regarding privacy, requiring accessibility in public-use autonomous vehicles, and infrastructure.

The CCD Transportation Task Force thanks you for the opportunity to provide recommendations regarding priorities and issues addressed in a self-driving car bill. Please do not hesitate to contact us with any questions. We look forward to continuing to work with the Committee as legislation is developed.

Sincerely,
The CCD Transportation Task Force Co-Chairs:



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