



April 2, 2020

Submitted Online

U.S. Department of Transportation
Docket Management Facility
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0, Docket Number: DOT-OST-2019-0179-0001

The undersigned Consortium for Citizens with Disabilities (CCD) Transportation Task Force Co-Chairs are pleased to submit comments in response to the U.S. Department of Transportation's Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0 (AV 4.0). 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.

As we approach the 30th Anniversary of the Americans with Disabilities Act, we recognize that AVs have the potential to drastically improve access for people with disabilities, including members of the blind and low vision, Deaf and hard of hearing, intellectual, developmental and cognitive disability communities; people with physical disabilities, including wheelchair users; and people with neurological conditions, including epilepsy and seizure disorders. We agree with AV 4.0's statement that:

"AVs hold enormous potential to promote the independence, economic opportunities, and social well-being of older Americans and persons with disabilities by offering independent mobility for daily activities. (p. 3)"

However, the promise and safety of AVs will only be realized if the vehicles and the surrounding infrastructure are fully accessible, and the safety elements consider the needs of people with disabilities. We are grateful for the USDOT's proposal of an inclusive design challenge, the reconvening of the Coordinating Council of Access and Mobility, and NHTSA research projects on accessibility and AV safety for people with disabilities. We urge you to also consider the following recommendations, many of which can be found in the CCD AV Principles adopted in December 2018 and signed by 22 national organizations.¹

- All human machine interface (HMI) systems on AVs must be fully accessible to people with disabilities, including people with sensory, cognitive, and physical disabilities.
- Lifts, ramps and wheelchair securement must be available on common use and public transit AVs. Developers must address the issues of whether shoulder belts, and any controls needed to deploy securement, are accessible and usable for all wheelchair users. Rear-facing securements, which require far less outside assistance than other securement systems in use today, should be explored.
- AV standards should ensure adequate safety and crashworthiness for all people with disabilities, including wheelchair users who remain in their wheelchairs in the vehicle.
- Exemptions should not be granted for development and testing of any AV vehicles meant for transit, paratransit, microtransit, first mile/last mile or circulator service that are not equitable and fully accessible.
- Equivalent, integrated service must be the standard in transit, versus tiered service that would lead to segregation and lower quality service for wheelchair users and those who depend on transit.
- A USDOT AV Advisory Committee should be established and should include an accessibility subcommittee. Members should include organizations representing individuals with disabilities and people who are elderly, and standard setting organizations. Individual representatives should include, but not be limited to, individuals who are blind and who have visual impairments; individuals who are Deaf and who have hearing loss; individuals with intellectual, cognitive, or developmental disabilities; individuals who have physical disabilities, including wheelchair users; and individuals with neurological conditions including epilepsy and seizure disorders.
- Any USDOT grants funding autonomous vehicle projects should require that people with disabilities are part of the design and testing of new technologies in order to ensure the accessibility and usability of the technology.
- NHTSA should prioritize hiring of full-time employees with a disability and/or with expertise in universal design to lead accessible vehicle crashworthiness and safety standards research and development.

Thank you again for your commitment to mobility for all. We look forward to remaining engaged in these vital conversations. Please do not hesitate to contact Carol Tyson, ctyson@dredf.org, with any questions.

Sincerely,

Consortium for Citizens with Disabilities Transportation Task Force Co-Chairs

Sarah Malaier, American Foundation for the Blind
 Lee Page, Paralyzed Veterans of America
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 Carol Tyson, Disability Rights Education & Defense Fund

¹ CCD Transportation Task Force Autonomous Vehicle Principles, adopted December 2018. Found at: <http://www.c-c-d.org/fichiers/CCD-Transp-TF-AV-Principles-120318.pdf>