



February 17, 2022

Via electronic mail

The Honorable Eleanor Holmes Norton  
United States House of Representatives  
2136 Rayburn House Office Building  
Washington, DC 20515

The Honorable Rodney Davis  
United States House of Representatives  
2079 Rayburn House Office Building  
Washington, DC 20515

Dear Chair Norton and Ranking Member Davis,

The Consortium for Citizens with Disabilities (CCD) Transportation Task Force Co-Chairs write to provide comment on issues addressed in the February 2, 2022 Highways and Transit subcommittee hearing “The Road Ahead for Automated Vehicles.” 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 free from racism, ableism, sexism, and xenophobia, as well as LGBTQ+ based discrimination and religious intolerance

The CCD Transportation Task Force developed Autonomous Vehicle (AV) principles in December 2018<sup>i</sup>. Signatories to the Principles included 22 national organizations. The Principles were submitted to the US Department of Transportation (USDOT) in response to its request for comment on its AV 3.0 guidance. The Task Force also submitted detailed feedback in 2019 on issues to be addressed in a bi-cameral, bipartisan self-driving car bill. Please find the feedback attached.

During the February 2<sup>nd</sup> hearing there was acknowledgement that AVs could expand mobility access for people with disabilities. Nearly 1 in 5 people in the U.S. has a disability (more than 57 million). **In 1990, Congress passed the bipartisan Americans with Disabilities Act (ADA). In enacting the ADA, Congress sought to “provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.”** As a result, 99% of public buses are equipped with ramps, far more curb ramps benefit the public, and there is improved provision of accessible transit to people with sensory disabilities. **Yet, significant barriers to accessible, affordable transportation remain** across modes.

Many people with disabilities are currently unable to obtain a driver license, and cannot afford to purchase an accessible vehicle. Without affordable, accessible transportation people with disabilities are unable to travel to work, to school, to contribute to and participate in their

communities, to support and spend time with family and friends, and live their lives to the fullest.

**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. **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 all people with disabilities.**

We ask you to consider the following priorities, and to refer to our full responses submitted in 2019:

- First and foremost, legislation should require full accessibility for all types of common and public use electric and autonomous vehicles. Full accessibility, or inclusive design of a vehicle, ensures usability by people with sensory, physical, cognitive and neurological disabilities, including wheelchair users.
- Licensing discrimination on the basis of disability must also be prohibited.
- Infrastructure must be improved for AVs to maximize their benefits. Walk and rollability and access to vehicles for all will require accessible public rights of way such as sidewalks, curb cuts, accessible pedestrian signals, drop-off/pick-up points and cross walks. Funding for these improvements should prioritize underserved communities with the greatest need, and would provide much needed access and mobility for travelers with disabilities in the short and long term.
- Passenger safety should be protected by ensuring health and disability status and locations visited is not shared or used for commercial or tracking purposes without permission of the individual.
- We encourage studies examining the potential impacts on transportation and land-use patterns, congestion, pollution, road safety and public transit, members of low income, disability and Indigenous communities and communities of color.
- Finally, as you take seriously the needs of workers who may be impacted by the transition to both electric vehicles and AVs, and consider funding for training and new jobs, we ask you to ensure inclusion of workers with disabilities.

Thank you again for the opportunity to provide comments regarding the road ahead for AVs. Please do not hesitate to contact Carol Tyson at [ctyson@dredf.org](mailto:ctyson@dredf.org) with any questions. We look forward to supporting the work of the Committee on this important topic. Thank you for your commitment to ensuring people with disabilities benefit from, and are included in, the future of mobility.

Sincerely,

Consortium for Citizens with Disabilities Transportation Task Force Co-Chairs

Sarah Malaier, American Foundation for the Blind

Swatha Nandhakumar, American Council of the Blind

Claire Stanley, National Disability Rights Network

Carol Tyson, Disability Rights Education & Defense Fund

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<sup>i</sup> Consortium for Citizens with Disabilities Transportation Task Force Autonomous Vehicle Principles. December 3, 2018. Available at <http://www.c-c-d.org/fichiers/CCD-Transp-TF-AV-Principles-120318.pdf>