

Reason Foundation Comments on House File 3513: Autonomous Vehicles Regulated

Prepared for: Members of the Transportation Finance and Policy Committee
Minnesota House of Representatives

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Dear Co-Chairs Koznick and Tabke and members of the committee,

Thank you for the opportunity to offer our organization’s perspective on House File (HF) 3513 and the issue of regulating vehicles equipped with automated driving systems (ADS). My name is Marc Scribner, and I serve as senior transportation policy analyst at Reason Foundation. We provide pro bono consulting to public officials and stakeholders to help them design and implement policies related to transportation and infrastructure. I am also a member of the Transportation Research Board of the National Academies’ Standing Technical Committee on Developments and Advancements in Transportation Technology Law.

Our assessment of HF 3513 is based on my more than 15 years of research on the law and policy related to driving automation. We share the goal of the sponsors to enable access to this safety-enhancing technology in Minnesota, and believe HF 3513 strikes the appropriate balance.

Specifically, we find:

- The definitions of key terms such as “automated driving system” and “dynamic driving task” conform to the international consensus technical standard, SAE International Recommended Practice J3016, *Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles*;
- Required submission of first responder interaction plans to the Department of Public Safety will enable adherence to the Automated Vehicle Safety Consortium (AVSC) Best Practice for First Responder Interactions with Fleet-Managed Automated Driving System-Dedicated Vehicles (ADS-DVs) (AVSC-I-01-2024);
- Collision reporting requirements avoid duplicating or contradicting the federal data reporting mandate established by the National Highway Traffic Safety Administration’s Standing General Order 2021-01;
- Financial responsibility requirements are consistent with the state of practice in the United States;



- Clarification of human-specific provisions related to the operation of commercial motor vehicles and equipment requirements reflects best practices; and
- Establishing statewide autonomous vehicle policy on the basis of nondiscrimination preserves traditional local government and airport authorities to manage roadways and traffic.

Thank you for the opportunity to submit this written testimony on HF 3513, and we welcome the opportunity to advise the legislature on this subject in the future.

Sincerely,

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