

December 1, 2015

Brian G. Soublet, Assistant Chief Counsel
Department of Motor Vehicles
Legal Affairs Division
PO Box 932382, MS C-244
Sacramento, CA 94232-3820

Dear Mr. Soublet:

On behalf of the National Society of Professional Engineers (NSPE) and the California Society of Professional Engineers (CSPE), we submit the following comments regarding the California Department of Motor Vehicles' (CDMV) current consideration of properly regulating fully autonomous vehicles.

Regulation of fully autonomous vehicles is a complex and important issue with national implications. California has proven to be the leader in the development of smart technologies with other states often following California's initiative and are likely to do so in this case, as well. The opportunities, innovations and technologies that are rapidly bringing autonomous, or self-driving vehicles, to our roadways has created intense competition as companies are racing to be the first to develop and implement autonomous vehicles.

This situation presents an immense challenge for both infrastructure managers and policymakers because protecting public safety in the implementation of this rapidly emerging technology will require immediate action at the national, state and local levels of government. Timely steps must be taken to prepare for these rapidly changing shifts in society's dependence on smart technologies. Development of autonomous vehicles and their associated systems have the same, *if not a more significant*, impact on the public health, safety and welfare within the nation's transportation system.

NSPE urges that the CDMV, in its development of regulations related to fully autonomous vehicles and their associated systems, work to ensure that the policies recognize and incorporate the key role of licensed professional engineers in the development of autonomous vehicles and their associated systems. Professional engineers already play a key role in the protection of the public health, safety and welfare of the traveling public using the nation's infrastructure through state-based regulations. The design, development and deployment of autonomous vehicles and their support systems should not be treated any differently and should require the involvement of professional engineers to give the highest level of assurance to the protection of the public health, safety and welfare.

On behalf of the more than 32,000 members of NSPE, I offer NSPE's resources and support to help achieve this outcome.

NSPE appreciates the opportunity to provide these comments and we look forward to working with you on this matter. For immediate questions, please contact Marti Kramer, CEO of the California Society of Professional Engineers, at m.kramer@cspe.com or Arielle Eiser, NSPE Senior Manager of Government Relations, at aeiser@nspe.org.

Sincerely,



Timothy R. Austin, P.E., F.NSPE
President
National Society of Professional Engineers



Nader Shareghi, P.E.
President
California Society of Professional Engineers

1420 KING STREET
ALEXANDRIA, VA 22314
703•684•2800 FAX: 703•519•3763
www.nspe.org

333 UNIVERSITY AVENUE, STE 200
SACRAMENTO, CA 95825
916•563•7179
www.cspe.com