



October 27, 2025

Stacy Murphy,
Deputy Chief Operations Officer/Security Officer
White House Office of Science and Technology Policy
1600 Pennsylvania Ave NW
Washington, DC 20500

Re: Notice of Request for Information; Regulatory Reform on Artificial Intelligence (OSTP-TECH-2025-0067)

Dear Ms. Murphy,

The Autonomous Vehicle Industry Association (“AVIA”) writes in response to the Office of Science and Technology Policy’s (“OSTP”) Request for Information (“RFI”) on “Regulatory Reform on Artificial Intelligence.”¹ As an organization focused on the development and deployment of autonomous vehicles (“AVs”), AVIA encourages the administration to include considerations for AVs as it addresses regulatory reforms related to artificial intelligence (“AI”).² AVs represent a key AI-enabled technology and an industry in which the U.S. continues to lead the world. Maintaining and growing U.S. leadership in AVs will depend on the creation of a federal policy framework that will help support further research and development on AV technologies while accelerating the safe deployment of the technology across the country.

AVIA is committed to bringing the tremendous safety and mobility benefits of AVs—otherwise known as SAE Levels 4- and 5-capable vehicles—to consumers in a safe, responsible, and expeditious manner. Our membership is comprised of the world’s leading technology, automotive, ridesharing, trucking, and transportation companies.³ Vehicles operated by AVIA members have driven more than 145 million autonomous miles on U.S. public roads, a distance roughly equivalent to the average distance between Earth and Mars, or driving around the Earth 5,600 times.⁴ AVs will play a pivotal role in addressing critical challenges facing our nation, including

¹ Notice of Request for Information; Regulatory Reform on Artificial Intelligence, 90 Fed. Reg. 46422 (Sept. 26, 2025).

² AVIA provided similar comments to the docket of OSTP and NSF’s earlier RFIs on the AI Action Plan and the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan. *See* Autonomous Vehicle Indus. Ass’n, Comment Letter on Request for Information on the Development of an Artificial Intelligence (AI) Action Plan (Mar. 13, 2025).

³ Our members include Amazon, Aurora, AVRS Group, Bot Auto, Cavnue, Discount Tire, DoorDash Labs, Ford, Gatik, GM, International, J.D. Power, Kodiak, Lyft, Motional, NGV, Nuro, Plus, Stack, Tier IV, Torc Robotics, TaskUs, Uber, UPS, Volkswagen Group of America, Volvo Cars, Volvo Autonomous Solutions, Waabi, Waymo, and Zoox. *See Our Mission and Members*, AUTONOMOUS VEHICLE INDUS. ASS’N, <https://theavindustry.org/> (last visited Oct. 27, 2025).

⁴ AUTONOMOUS VEHICLE INDUS. ASS’N, STATE OF AV 2025, (May 2026), <https://theavindustry.org/resources/2025-State-of-AV.pdf>.



reducing the persistent and unacceptable level of traffic fatalities in our country, expanding transportation access, enhancing supply chain efficiency, and expanding economic output.

The continued development and deployment of AVs in the United States will help revive our industrial capacity, create new manufacturing jobs, reduce supply chain costs, and ensure that our nation retains its international leadership and competitive advantage as this critical technology continues to grow and evolve. To fully realize these benefits, a supportive and uniform nationwide federal policy framework is essential. With this in mind, earlier this year AVIA released *Securing American Leadership in Autonomous Vehicles*,⁵ a comprehensive set of federal policy recommendations that would accelerate the safe and timely deployment of AV technology and solidify the U.S. as the global leader in this transformational field. In the last several years, U.S. states have raced ahead on AV policy, and today 26 states have AV deployment statutes. While AVIA appreciates this interest by states, it is essential for the U.S. Department of Transportation (“USDOT”) to set nationally applicable design, construction, and performance standards for AVs, which is an authority it—and it alone—possesses. A federal framework for AVs is also vital to help maintain U.S. leadership in AV technology, as legal frameworks for AVs are already in place in China, the European Union, Germany, the United Kingdom, and elsewhere, giving foreign AV developers a level of regulatory certainty that can give them a competitive advantage over U.S. companies.

AVIA envisions a federal framework for AV safety that focuses on several key areas, including:

- **AV Safety, Transparency, and Accountability**

Actions that can be taken to promote AV safety, transparency, and accountability include undertaking a new rulemaking by the National Highway Traffic Safety Administration (“NHTSA”) to create new Federal Motor Vehicle Safety Standards (“FMVSS”) that apply to autonomous driving systems (“ADS”). These FMVSS should include behavioral competency tests to allow ADS manufacturers to self-certify their systems to demonstrate a basic level of ADS proficiency appropriate for the ADS’s operational design domain (“ODD”), and a requirement that ADS manufacturers develop a detailed “safety case” for their ADS. Additionally, NHTSA should build on its recent announcement that it will be amending several FMVSS to address manually operated controls and equipment in ADS-equipped and ADS-dedicated vehicles,⁶ as part of the USDOT’s Automated Vehicle Framework, which has included early regulatory action items that are a welcome first step.⁷ Finally, NHTSA should establish a National AV Safety Data Repository,

⁵ AUTONOMOUS VEHICLE INDUS. ASS’N, *SECURING AMERICAN LEADERSHIP IN AUTONOMOUS VEHICLES* (2025), <https://theavindustry.org/resources/Securing%20American%20Leadership%20in%20Autonomous%20Vehicles.pdf>.

⁶ *Trump’s Transportation Secretary Sean P. Duffy Advances AV Framework with Plans to Modernize Safety Standards*, NAT’L HIGHWAY TRAFFIC SAFETY ADMIN. (Sept. 4, 2025), <https://www.nhtsa.gov/press-releases/av-framework-plan-modernize-safety-standards>.

⁷ *See Trump’s Transportation Secretary Sean P. Duffy Unveils New Automated Vehicle Framework as Part of Innovation Agenda*, U.S. DEP’T OF TRANSP. (Apr. 24, 2025), <https://www.transportation.gov/briefing-room/trumps-transportation-secretary-sean-p-duffy-unveils-new-automated-vehicle-framework>.



which will include relevant safety data about AV incidents and be available to state regulators, with appropriate protections for confidential business information. Such actions would provide additional regulatory certainty for AV developers, allowing them to innovate further and help grow the domestic AV industry.

- **Supporting Supply Chain Resiliency Through AV Trucking**

Autonomous trucking can ease supply chain burdens while supporting trucking jobs and increasing roadway safety. The Federal Motor Carrier Safety Administration (“FMCSA”) can support autonomous trucking by codifying the first Trump Administration’s 2018 interpretation that the Federal Motor Carrier Safety Regulations do not require a human driver to operate or be present in a commercial motor vehicle (“CMV”) being operated by a Level 4 or Level 5 ADS. An AVIA analysis found that “there has been more than \$6 billion in private capital invested into AV trucking companies, with even more in the public markets and acquisitions” following the seminal 2018 guidance.⁸ The agency should also update existing hours of service and inspection requirements that currently require action by a human driver, and, in partnership with industry and law enforcement, build on and support the existing consensus approach to autonomous truck inspection protocols. For example, the FMCSA should continue to support the Commercial Vehicle Safety Alliance on its Enhanced CMV Inspection Program for autonomous CMVs.

Additionally, in cooperation with Congress or on its own, the FMCSA should streamline and update regulations to accommodate the integration of ADS into CMVs. This should include updating vehicle width limits (49 U.S.C. § 31112) to give flexibility for the placement of sensors and other key safety technologies.

Finally, the FMCSA should move to codify its recently granted temporary waiver that allows ADS-equipped CMVs to use new emergency warning device solutions that utilize cab-mounted beacons instead of driver placed devices. Existing regulations require warning devices (e.g., warning triangles) to be placed within 10 minutes in three locations on the roadway,⁹ complicating autonomous CMV operations where no human driver is present. With the waiver now in place, the FMCSA should move to update existing regulations to allow the wider use of these beacons. These regulatory reforms are especially important as the beacons present a new safety technology that could be applied not only to AVs, but traditional CMVs, improving roadway safety for all users.

- **Promoting U.S. AV Leadership**

Regulatory reform related to AI should also include considerations for providing federal support for growing the domestic supply chain for AI-enabled technologies, including AVs. At present the

⁸ *The Trump Administration policy that kickstarted a supply chain revolution*, AUTONOMOUS VEHICLE INDUS. ASS’N (Apr. 23, 2025), <https://www.theavindustry.org/blog/the-trump-administration-policy-that-kickstarted-a-supply-chain-revolution>.

⁹ See 9 C.F.R. § 392.22(b); 49 C.F.R. § 393.95(f).



AV industry's supply chain is diverse, relying on suppliers from across the globe. When sourcing equipment, AV developers must balance technical demands, performance requirements, costs, and production and deployment timelines. At times, domestic AV developers are required to source parts from abroad when no domestic vendor can provide components that meet performance requirements and commercially viable prices. To counteract this, federal support and funding can be leveraged to build out a larger domestic supply chain for AVs by creating opportunities for domestic suppliers to step into the market.

The administration, in partnership with Congress and industry, should create a pilot program to incentivize the domestic production of sensors through a grant program or other mechanism. At the same time, the USDOT should be tasked with convening relevant stakeholders to discuss needed actions for domestic manufacturing of AV hardware. These activities should be informed by learnings from the Headwaters Tech Hub in Montana, which is focused on photonics.¹⁰ Initiatives like the Headwaters Tech Hub will help develop domestic supply chains while providing valuable education and employment opportunities for communities across the country. Creating and funding additional opportunities to solidify U.S. leadership on AV supply chains should be an integral part of the federal government's AI efforts.

AVIA lays out these actions and others in greater detail in *Securing American Leadership in Autonomous Vehicles*, including actions that Congress can take to support AV innovation through comprehensive AV legislation. AVIA encourages OSTP to take these ideas and the needs of the AV industry into account as it continues to pursue policy and regulatory reforms related to AI. Federal action is needed to help unlock the full potential of AVs and ensure that the United States remains the world leader in AV technology.

AVIA is grateful for the opportunity to provide these comments and welcomes the opportunity to continue our engagement with OSTP on this and other matters. If there is anything further we can do to assist you or your staff, please do not hesitate to reach out.

Sincerely,

Jeff Farrah
Chief Executive Officer
Autonomous Vehicle Industry Association

¹⁰ See HEADWATERS TECH HUB, <https://headwaterstechhub.com/> (last visited Oct. 27, 2025).