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POLICY INSTITUTE FOR ENERGY, ENVIRONMENT, AND THE ECONOMY

Technology is Outpacing State Automated Vehicle Policy

ISSUE PAPER
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Summary

Existing statutes related to Automated Vehicles (AVs) tend to be preliminary in scope. This paper creates a scale for evaluating AV policy: from most permissive to most restrictive. Our findings are that AV policy among states varies considerably, but many policies are in the middle of the road, and many states have limited legislative actions to codifying definitions or establishing exploratory committees. This assessment points to the fact that states are readying to take more decisive action. Therefore, it is critical to identify some possible best practices for AV policy development as states explore the topic. Our analysis points to the following guidelines for developing safe, equitable and sustainable AV policy:

- Designate clear regulatory roles and responsibilities.
- Clarify safety and liability requirements.
- Ensure interoperability between states.
- Align AV regulations with local greenhouse-gas (GHG) reduction goals.
- Incentivize AV businesses to operate in a shared fleet.
- Require data reporting.

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1 Introduction

Automated-vehicle (AV) technologies have been in development for over 30 years, starting with the NavLab project from Carnegie Mellon University in 1984.[1] But these technologies have only recently started to become mainstream. Features like adaptive cruise control, automatic lane keeping, and automatic braking are now standard in many vehicles. Companies like Waymo have logged thousands of miles in driverless cars, and multiple cities have launched driverless pilot programs. But as AV technology accelerates, AV policy is slow to keep up.

As of now, AV technology is largely self-regulated in the United States. Federal AV governance has been limited to voluntary guidance documents from the U.S. Department of Transportation (USDOT), while Congress has tried and failed to pass AV legislation. As a result, there is little oversight stopping companies from equipping hundreds of thousands of vehicles already on the road with unregulated automated features, or the ambitious garage engineer from trying out their homemade self-driving van on public highways.[2]

As fatal accidents involving AVs have raised concerns about AV safety, certain state, regional, and local governments have stepped in to fill the federal leadership vacuum.[3] This paper analyzes existing state-level AV policies, and provides recommendations to support development of new, effective, and consistent AV policies moving forward.

2 Background

SAE International (previously known as the Society of Automotive Engineers) has developed a widely used system for classifying vehicle-automation levels.[4,5] Most vehicles on the road today are Levels 0, 1, or 2. Vehicles with advanced Level 2 features—such as Tesla's "Autopilot" system—are also commercially available, albeit much less widely. Tesla is aiming to provide Level 3 features to some of their vehicles through over-the-air software updates in the near term, but those features are not yet released and information about their limitations is not readily available.[6] Level 4 vehicles are being developed by companies like Waymo and Alphabet as well as by multiple established automakers, and are in use in some pilot programs. Level 5 represents the greatest possible capacity that automated vehicles could attain—the capacity to drive anywhere, anytime without any human assistance.[7,8]

AV policies can encompass one or more levels of vehicle automation, and may be designed to address a variety of potential impacts on public society. While the majority of existing AV policies in the United States focus on safety, research indicates the value of considering impacts of AVs in other domains (e.g., mobility,[9] affordability,[10,11] and emissions[12,13]). AV policies can also be proactively designed to maximize synergies among the "Three Revolutions" of transportation: vehicle automation, sharing, and electrification.[14]

[1] "The Carnegie Mellon University Autonomous Land Vehicle Project (NAVLAB)," http://www.cs.cmu.edu/afs/cs/project/alv/www/index.html.
[2] Bryant Walker Smith, "Automated Vehicles Are Probably Legal in the United States," *Texas A&M Law Review* 411 (June 2014).
[3] Austin Brown, Greg Rodriguez, and Tiffany Hoang, "Federal, State, and Local Governance of Automated Vehicles" (issue paper, UC Davis Institute of Transportation Studies and UC Davis Policy Institute for Energy, Environment, and the Economy, December 2018).
[4] SAE International, "Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles" (September 2016).
[5] Brown, Rodriguez, and Hoang, "Federal, State, and Local Governance."
[6] Tesla, "Autopilot and Full Self-Driving Capability," https://www.tesla.com/support/autopilot.
[7] National Conference of State Legislatures, "Autonomous Vehicles | Self-Driving Vehicles Enacted Legislation," http://www.ncsl.org/research/transportation/autonomous-vehicles-self-driving-vehicles-enacted-legislation.aspx.
[8] SAE International, "Taxonomy and Definitions."
[9] Kelly L. Fleming, "Social Equity Considerations in the New Age of Transportation: Electric, Automated, and Shared Mobility," *Journal of Science Policy & Governance* 13, no. 1 (October 2018).
[10] Stuart Cohen and Sahar Shirazi, "Can We Advance Social Equity with Shared, Autonomous and Electric Vehicles?" (policy brief, UC Davis Institute of Transportation Studies, February 2017).
[11] Jesse Cohn, et al., "Examining the Equity Impacts of Autonomous Vehicles: A Travel Demand Model Approach," *Transportation Research Record* 2673, no. 5 (2019).
[12] Ardalan Vahidi and Antonio Sciarretta, "Energy Saving Potentials of Connected and Automated Vehicles," *Transportation Research Part C: Emerging Technologies* 95 (October 2018): 822–43.
[13] Judith M. Greenwald and Alain Kornhauser, "It's Up to Us: Policies to Improve Climate Outcomes from Automated Vehicles," *Energy Policy* 127 (April 1, 2019): 445–51.
[14] Daniel Sperling, *Three Revolutions: Steering Automated, Shared, and Electric Vehicles to a Better Future* (Island Press, 2018).

Encouraging the three revolutions will require policies to be proactively implemented at the federal, state, and local level. Although the federal government is largely taking a hands-off approach, states and local governments can start implementing policies that will ensure public benefit of AVs. The federal government is traditionally responsible for safety standards, but the absence of guidelines has led some state and city governments to take actions that would typically fall out of their purview, despite the looming possibility that future federal policy may preempt their actions.[15]

Cities can begin setting AV policies by laying out working groups and definitions to explore and decide what actions need to be taken, as well as designating what entities will be responsible for enforcing any regulations or standards the state passes. In some cases, existing regulations and rules may need to be adapted or amended to make them applicable to AVs. Finally, new regulations and standards should be enacted related to both safety concerns and environmental considerations. Many states and cities have laid out and enacted climate goals related to a reduction in emissions. While the Clean Air Act (Section 177) protects the rights of states to regulate greenhouse gas emissions (GHGs) there remains concern that federal preemption pertaining to AVs will mean states cannot enact legislation requiring AVs to meet minimum emissions guidelines. Similar concerns are created with state preemption of local jurisdictions from regulating or banning AVs from their roadways.[16]

3 Analysis: Current State Regulations

Absent federal leadership on AV policy, certain state, regional, and local governments have begun developing and implementing AV policies on their own. A 2018 issue paper from the UC Davis Policy Institute for Energy, Environment, and the Economy explored the challenges associated with divided AV governance. The paper concluded that while standards for AV safety, design (to support interoperability of AV components and infrastructure), and similar factors should be set at the federal level, federal policy should "preserve the authority of states, regions, and cities as well as other stakeholders to pursue their own goals."[17] The goal of this issue paper is to take a closer look at existing and proposed AV policies at the state level using the database created by The National Conference of State Legislatures (NCSL). NCSL has tracked and compiled legislative actions that each state and Washington, DC in the U.S. have introduced and passed. The map in Figure 1 is from the NCSL database, and shows which types of AV legislation (state legislature, executive order, or both), if any, have been enacted in each state. In this analysis, we have categorized each of those bills, in order to better understand what types of policy states have implemented, and what steps are necessary to follow. Details for each enacted bill or executive order, including state, year, and bill number, can be found in the NCSL database.[18] This analysis differs from other policy and readiness trackers such as the KPMG Autonomous Readiness Index[19] and the Frost and Sullivan Smart Mobility City Tracker[20] as it takes information from the NCSL database, and categorizes the types of policies states are passing, both for technology readiness and for addressing societal implications.

3.1 Enacted AV Policies and Programs

Figure 1 indicates states that have already taken action on AVs, either by passing a law, issuing an executive order (EO), launching a pilot program, or some combination of the above. States outlined in purple have active AV pilot programs, regardless of the status of legislation.[21]

[15] Bryant Walker Smith, "Automated Vehicles Are Probably Legal."

[16] National League of Cities, "Autonomous Vehicle Pilots Across America," https://www.nlc.org/resource/autonomous-vehicle-pilots-across-america.

[17] Brown, Rodriguez, and Hoang, "Federal, State, and Local Governance."

[18] National Conference of State Legislatures, "Autonomous Vehicles"

[19] KPMG International, *2019 Autonomous Vehicles Readiness Index* (February 2019).

[20] Frost & Sullivan, "Smart Mobility City Tracker," https://go.frost.com/LA_PR_AT_FValente_SmartCity_APR19.

[21] Bloomberg Philanthropies and The Aspen Institute, "Bloomberg Aspen Initiative on Cities and Autonomous Vehicles," https://avsincities.bloomberg.org/global-atlas.

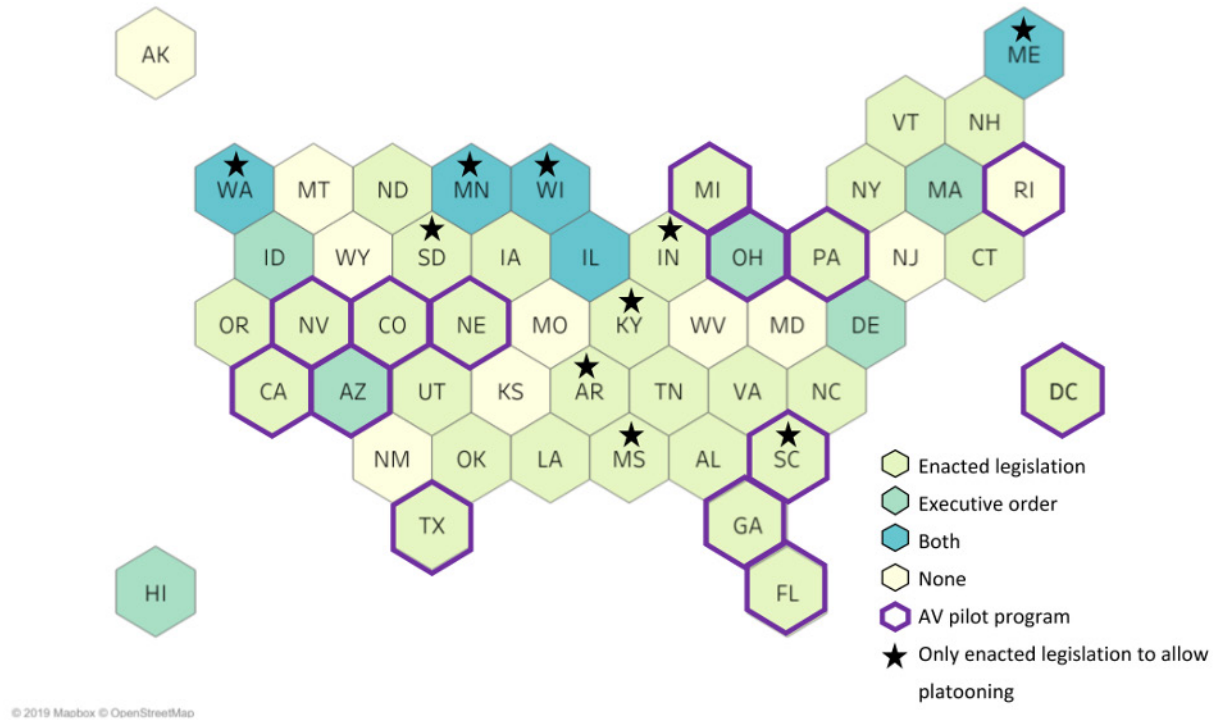

Figure 1. State-level activity on AVs. *Light-yellow states have taken no statewide action on AVs, light-green states have enacted legislation related to AVs, teal states have issued an executive order related to AVs, and blue states have enacted both legislation and executive orders related to AVs. States outlined in purple are actively deploying AV pilots. Information on legislation and executive orders from the NCSL; information on pilot programs from Bloomberg Aspen Initiative on Cities and Autonomous Vehicles Global Atlas Project.*

Existing state laws and EOs related to AVs tend to be preliminary in scope. Many policies are limited to codifying a definition of automated or autonomous technology for the sake of future legislation and for legal purposes, and/or to establishing a committee, task force, or working group to study the impacts and implications of AVs on their state. The most common legislative action on AVs outside of these preliminary steps involves allowing AVs to maintain closer following distances than human-driven cars in order to enable "platooning"—i.e., allowing AVs to travel close together to minimize aerodynamic drag and maximize fuel efficiency.

State AV policies can also affect actions at the local level. In some cases, state policy explicitly preempts local governments from regulating or banning AV technology in their jurisdictions. Such preemptive legislation may be justified on the grounds that it prevents conflicts between state and local authorities and avoids the emergence of a confusing "patchwork" of policies. Preemption could be especially problematic in places where there are already unique overlapping authorities, e.g. Washington D.C. (City, Maryland, Virginia, Federal), or the tri-state area (New York City, New York State, New Jersey, and Connecticut). Even intercity preemption, such as the East Bay and South Bay in the San Francisco metropolitan area have proven to have potentially conflicting policy approaches. But not all states with preemptive legislation also have legislation that expressly permits AVs or regulates AVs: that is, some states prevent local governance of AVs while also failing to provide governance at the state level.

3.2 Permissive Versus Regulatory Policies

The nature of state AV policies varies from state to state. We observed several trends related to the regulatory stage setting standards and guidelines across state policies. Some states have enacted regulations, however, more have removed restrictions for AV operation without setting guidelines. To better analyze this pattern, states were ranked from -1 to 3 based on the permissiveness of their AV policies. Scoring criteria are contained in Table 1 and scores are displayed in Figure 2.

Table 1. Criteria for "permissiveness" scoring of state AV policies

Score	Definition
-1	Restrictions on some (SAE Level 4 and 5) AVs.
–	No enacted AV legislation.
1	Basic AV legislation to establish a study, committee, or guideline.
2	Legislation that removes restrictions on AV operation, such as removing following too closely laws for platooning vehicles.
3	Legislation that expressly authorizes AV operation on public roads.

A score of -1 indicates a restriction on level 4 or level 5 AVs, (-) indicated no enacted legislation, and scores from 1 to 3 indicated the relative permissiveness of existing legislation (i.e., 3 indicates that AV operation is authorized without restriction whereas 1 indicates stricter regulation of AV operation). The District of Columbia was the only score of -1, owed to legislation requiring that a vehicle driven on public roads must have a human driver with ability to manually override any automated systems at any time. This prohibits some SAE Level 4 and Level 5 vehicles from operating on DC roads, but this should not be interpreted as a ban; instead, it reflects a nascent perspective on AV technology. DC has also taken a more robust approach to AV policies than most states, including legislation and action to specifically investigate the impact of AVs on equity and the environment. The only state with environmental regulatory policies of AVs is California, and those bills specifically refer to AVs used as a service. One piece of legislation allows a tax on vehicles that are not shared in the City of San Francisco, and the other requires greenhouse gas emissions reporting from TNCs. Though neither of these bills specifically target AVs, they both mention the use of AVs as TNC services as a proactive measure before they are on-road. The map in Figure 2 shows which states have enacted bills laying out foundational steps for regulation and authority over AVs, outlined in green.

3.3 Governing Bodies

Not every state with legislation regulating or permitting AVs has a designated agency or other governing body responsible for overseeing AV testing or licensing. Figure 3 shows states that have designated an AV governing body—whether for safety and operation, for licensing, or both. In some cases where there is a lack of legislation, there may be an assumption that the default regulatory authority will fall to the state DOT, or DMV, depending on state regulatory norms.

Every state has designated an authority for Transportation Network Companies (TNCs) (i.e., ridehailing companies like Uber and Lyft). These authorities can be assumed to be responsible for overseeing Mobility as a Service (MaaS), which may include AVs that are operating as a business in the future, but it is unclear what their roles will be in regulating the operation and liability of vehicles without human drivers without legislation to guide them.

States with legislation establishing regulations are shown in Figure 3. States shaded in blue have legislation establishing some sort of regulatory guidelines for the state. We characterized whether each state has designated a regulating authority specifically for AVs, for safety and operation, for licensing, or both. Regulatory agencies for each state are listed in the Appendix.

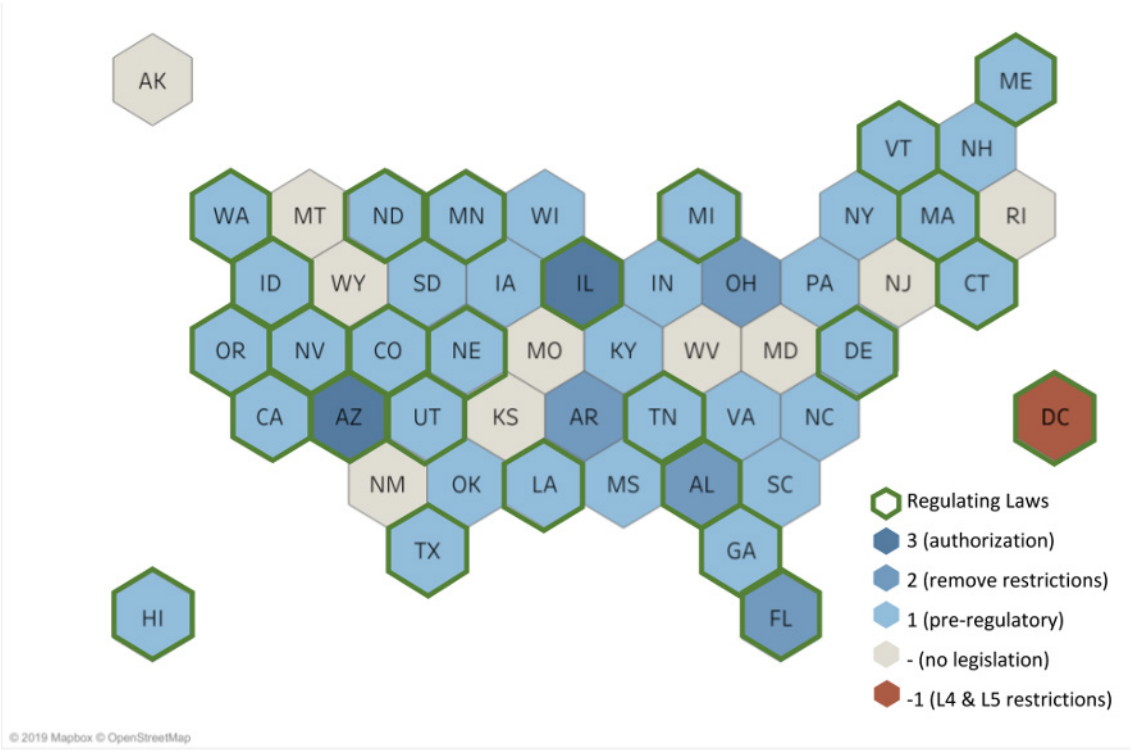

Figure 2. Map showing relative "permissiveness" of state AV legislation, based on scoring criteria contained in Table 1. *States outlined in green have passed legislation or an executive order that lays a foundation for future AV policies (e.g., by forming an AV committee or council, formalizing definitions of AV technology, or directing further study of AVs).*

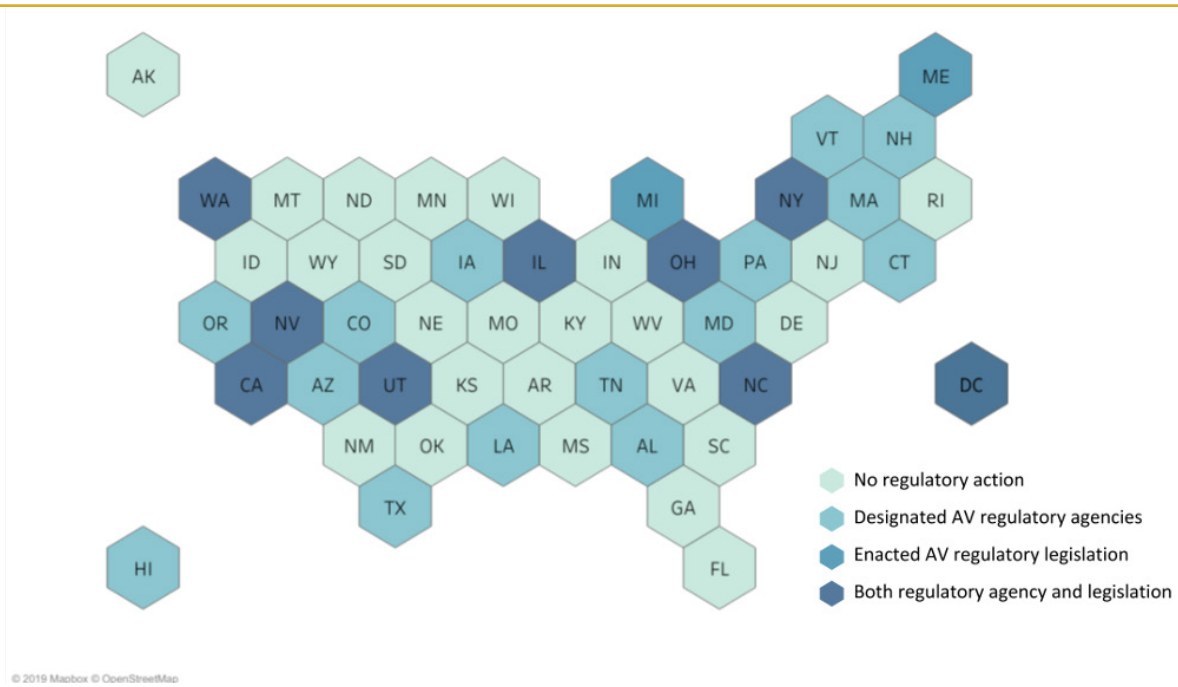

Figure 3. Map showing which states have designated AV governing bodies. *Light-green states have not taken any regulatory steps. Light-teal states have designated an AV governing body, but have not enacted any regulatory legislation. Dark-teal states have enacted regulatory legislation, but have not designated an AV governing body. Dark-blue states have both regulatory legislation and designated governing bodies.*

4 Current Status of AVs

Like states, cities are also implementing their own AV pilot programs and guidelines. Local AV programs and guidelines are sometimes implemented in the absence of state guidelines, although sometimes with explicit permissions from state authorities. The National League of Cities provides a comprehensive overview of AV pilot programs in the United States, which they update periodically every 2-4 weeks.[22] Bloomberg Philanthropies and the Aspen Institute also maintain a list of cities with AV pilot programs, which was used in Figure 1.[23] Some cities have solicited AV companies to come test on their streets, either with no state guidelines, or with explicit permissions from their states.[24]

Some cities have coordinated with private companies on AV testing. Examples include Tampa, FL (which partners with AECOM); Denver, CO (Panasonic); and the suburbs of Phoenix, AZ (Cruise [the AV unit of GM], Ford, and Intel). The federal government has also awarded funding to cities for "advanced transportation technologies" through the Smart City Challenge and other grants.[25]

Many local AV pilots focus on AVs for shuttles and microtransit, rather than for personal use or in MaaS applications. Many cities see AVs as a "last mile" solution for both transit and freight. State regulation is a commonly cited barrier to implementation of local AV pilots and programs, though generally a less significant one than inadequate funding and managerial capacity.[26]

5 Policy Recommendations

As AV technology becomes more widely available across the country, policies should be enacted to ensure consistent safety and environmental requirements across state lines. All states should have minimum requirements for companies to operate AVs in MaaS applications, just as all states have minimum requirements for operating manually driven vehicles.

Figure 4 shows our recommended policy roadmap for legislative and regulatory action. First, states must decide whether to take action. If actions are pursued, then pre-regulatory actions are the logical next step (although incorporating this effort into other early policy decisions is also a reasonable option). Then states should consider policy along the five policy types shown in the middle row, which are criteria needed for AVs to operate efficiently, safely, and sustainably across the United States. The bottom row indicates what cross-cutting policy areas governing bodies will need to take regulatory action and authority over. In all cases there will be multiple regulatory actions and disparate authorities. For example, to address concerns over traffic and congestion impacts, actions will be required from state departments of transportation, regional planning entities, and cities. Some of these criteria would be best implemented at the federal level, but can be implemented at the state level in the interim. California is the only state that currently has met all criteria in the middle row, and designated some regulatory authorities.

As states craft AV policies, they should consider the following:

(1) Designate regulatory roles. In order to avoid confusion over preemption, federal and state authorities should designate which agencies or commissions are responsible for regulating and overseeing AVs. Authorities should specify which entity (or entities) is/are responsible for the regulatory scheme, which includes safety testing, environmental compliance, and licensing and registration. Federal and state authorities should also define the roles and responsibilities of local governments. These agencies should establish a reasonable minimum requirement for AV operation within the state.

[22] National League of Cities, "Autonomous Vehicle Pilots."
[23] Bloomberg Philanthropies and The Aspen Institute, "Bloomberg Aspen Initiative."
[24] Daniel Chatman and Marcel Moran, *Autonomous Vehicles in the United States: Understanding Why and How Cities and Regions Are Responding*, (Berkeley Institute of Transportation Studies, August 2019).
[25] U.S. Department of Transportation, "Smart City Challenge," https://www.transportation.gov/smartcity.
[26] Bloomberg Philanthropies and The Aspen Institute, "Bloomberg Aspen Initiative."

(2) Clarify safety and liability requirements. In order to provide a stable and predictable regulatory landscape for innovators, states can consider implementing minimum safety standards for any AV operating on public roads within their jurisdiction. They should also define the role and responsibilities of local governments. These include testing standards, licensing requirements, and liability requirements (implemented legislatively, and reconciled with current rules).[27]

(3) Ensure interoperability between states. State policymakers should coordinate to align standards and regulations such that AVs can easily and safely be driven across state lines. For example, minimum safety standards and licensing requirements driving on public roads should be unified enough that AVs can be driven across state lines legally.

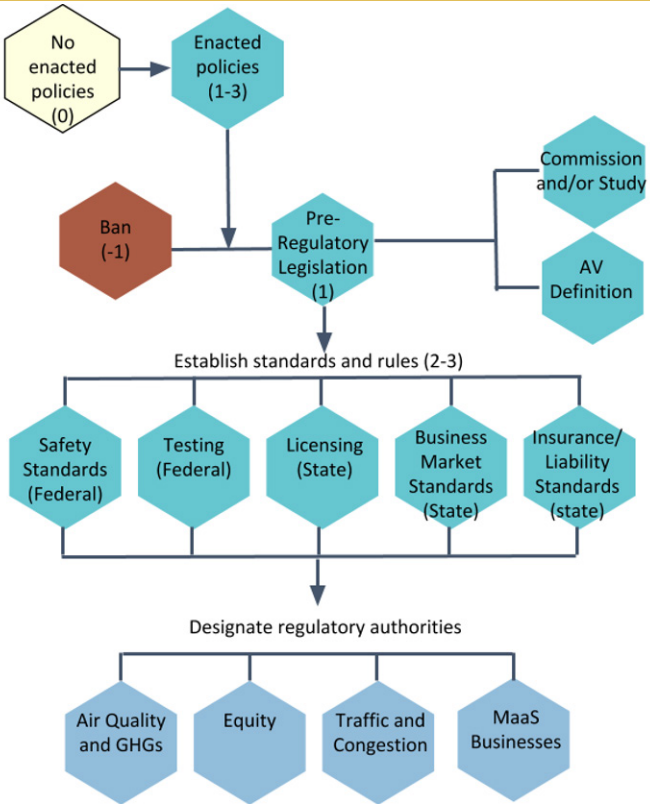

Figure 4. Flow chart showing the stages of AV policy at varying levels of government for interoperability of AVs between states, and the corresponding permissiveness score shown in parentheses.

(4) Align AV policy with local greenhouse-gas (GHG) reduction goals. Strategic deployment of AVs can help states meet GHG-reduction goals through their Climate Action Plans. AV policies should encourage shared and electric AVs and should incentivize lower vehicle miles traveled (VMT). Legislative action should be taken so that the federal government cannot preempt action on emissions from AVs.

(5) Incentivize AV business models that operate in a shared fleet. To achieve sustainability and congestion goals it will be essential that most AVs operate in a pooled fleet. Policymakers may decide to implement more stringent safety and licensing standards for businesses not operating in a pooled fleet and/or to set limit fleet emissions per passenger mile.

(6) Require data reporting. Clear data-reporting requirements will help ensure compliance with AV policies and will help inform future planning and policymaking efforts related to AVs. Data should be stored in a secure repository that is accessible to researchers and public officials, but also includes robust user-privacy protections.

6 Conclusion

AV policies at the state level vary widely. While a few states (like California) have adopted policies and regulations to require AVs to comply with environmental regulations and safety standards, the AV regulatory landscape in most states is highly incomplete. Ten states have not adopted any AV-specific legislation at all—a concerning fact

[27] Gordon Anderson, Austin Brown, and Hannah Safford, "Reshaping Liability and Insurance Rules for Automated Vehicles" (policy brief, UC Davis Policy Institute for Energy, Environment, and the Economy, January 2019).

given the absence of binding AV regulations at the federal level. Many states have only adopted legislation related to platooning trucks, excluding those states, sixteen states have not adopted any legislation. In the absence of federal guidelines, there may be a benefit for states to model their standards on states who are early adopters, like California to ensure more uniformity. This will avoid the dreaded "patchwork" of state policy that worries private sector stakeholders.

States are often starting by establishing committees, working groups, and studies on the impacts of AVs in their regions. This is unsurprising because there are still many unanswered questions and many unknowns. Following this type of investigatory legislation, states should design implementation strategies that will ensure the deployment of AVs aligns with state environmental, social, and economic objectives. Finally, states should designate governing bodies and rules for operating AVs on public roads.

For the United States to be a leader in AV innovation and deployment, the nation needs a cohesive and seamless set of AV policies. The nation cannot achieve this goal without decisive federal leadership. States can complement federal actions by doing what they do best, serving as the nations' test labs for democracy. This can include assessing AV policy needs, designating agencies to enforce AV standards and regulations, and working together across jurisdictional borders to develop clear and consistent AV policy.

Appendix

Table A1. AV and TNC regulatory agencies by state

State	Code	AV Regulatory Agency	TNC Regulatory Agency[i]
Alabama	AL	Alabama Department of Transportation	Alabama Public Service Commission
Alaska	AK	–	Department of Administration, Alaska Department of Motor Vehicles
Arizona	AZ	Arizona Department of Transportation	Arizona Department of Transportation
Arkansas	AR	–	Arkansas Department of Transportation
California	CA	California Public Utilities Commission	California Public Utilities Commission
Colorado	CO	Colorado State Patrol/Colorado Department of Transportation	Colorado Public Utilities Commission
Connecticut	CT	Connecticut Office of Policy and Management	Connecticut Department of Transportation, Commissioner of Transportation
Delaware	DE	–	Delaware Department of Transportation
Florida	FL	–	Florida Department of Financial Services
Georgia	GA	–	Georgia Department of Public Safety
Hawaii	HI	Hawaii Department of Transportation; Department of Public Safety; Department of Business and Economic Development	Department of Commerce and Consumer Affairs*
Idaho	ID	–	Idaho Department of Motor Vehicles
Illinois	IL	Illinois Department of Transportation	Illinois Secretary of State
Indiana	IN	–	Indiana Department of Transportation
Iowa	IA	Department of Transportation	Iowa Department of Transportation
Kansas	KS	–	Kansas Department of Vehicles, Department of Revenue
Kentucky	KY	–	Kentucky Transportation Cabinet, Department of Vehicle Regulation
Louisiana	LA	Louisiana Department of Transportation and Development	Louisiana Secretary of State*
Maine	ME	Commission (in development)	Maine Secretary of State
Maryland	MD	Maryland Department of Transportation	Maryland Public Utilities Commission; Maryland Public Service Commission
Massachusetts	MA	Massachusetts Department of Transportation	Massachusetts Department of Public Utilities
Michigan	MI	–	Michigan Department of Licensing and Regulatory Affairs
Minnesota	MN	–	Minnesota Department of Commerce
Mississippi	MS	–	Mississippi Department of Insurance
Missouri	MO	–	Missouri Department of Revenue

[i] BERK Consulting, *Policy Guide: Regulation of Transportation Network Companies* (January 2019).

Montana	MT	–	Montana Public Service Commission (Utilities)
Nebraska	NE	–	Nebraska Public Service Commission
Nevada	NV	Nevada Department of Motor Vehicles	Nevada Transportation Authority
New Hampshire	NH	New Hampshire Department of Safety; New Hampshire Department of Motor Vehicles	New Hampshire Department of Safety
New Jersey	NJ	–	New Jersey Motor Vehicle Commission
New Mexico	NM	–	New Mexico Public Regulation Commission
New York	NY	New York Department of Motor Vehicles	New York Department of Motor Vehicles
North Carolina	NC	North Carolina Department of Transportation Committee	North Carolina Department of Transportation, North Carolina Department of Motor Vehicles
North Dakota	ND	–	North Dakota Department of Transportation
Ohio	OH	DriveOhio	Ohio Public Utilities Commission
Oklahoma	OK	–	Oklahoma Corporation Commission
Oregon	OR	Oregon Department of Transportation	–
Pennsylvania	PA	Pennsylvania Department of Transportation	Pennsylvania Public Utility Commission
Rhode Island	RI	–	Rhode Island Division of Public Utilities and Carriers
South Carolina	SC	–	South Carolina Public Utility Commission
South Dakota	SD	–	South Dakota Department of Revenue, Motor Vehicle Division
Tennessee	TN	Tennnessee Department of Safety	Tennessee Public Utility Commission
Texas	TX	Texas Department of Public Safety	Texas Department of Licensing and Regulation
Utah	UT	Utah Division of Consumer Protection; Department of Commerce	Utah Department of Commerce, Division of Consumer Protection
Vermont	VT	Vermont Agency of Transportation/Traffic Committee	Vermont Department of Motor Vehicles, Commissioner
Virginia	VA	–	Virginia Agency of Transportation, Virginia Department of Motor Vehicles
Washington	WA	Washington Department of Licensing	Joint Transportation Committee
Washington, DC	DC	Department of For-Hire Vehicles	Department of For-Hire Vehicles
West Virginia	WV	–	West Virginia Department of Transportation; West Virginia Department of Motor Vehicles
Wisconsin	WI	–	Department of Safety and Professional Services
Wyoming	WY	–	Wyoming Department of Transportation