



Sept. 24, 2015

Jean Shiimoto
Director
Department of Motor Vehicles
2415 1st Ave., Mail Station F101
Sacramento, CA 95818-2606

Re: Petition for Rulemaking Pursuant to Government Code section 11340.6 to require police investigations of autonomous vehicle crashes and that copies of any video and recorded data related to an accident be provided to the DMV

Dear Director Shiimoto:

Consumer Watchdog hereby requests that you immediately initiate a rulemaking proceeding to amend the regulations governing the testing of autonomous vehicles in California to require a manufacturer whose autonomous vehicle is involved in an accident on a public road to summon police to investigate the crash. In addition the accident reporting regulation should require that copies of any video or recorded data related to the accident must be provided to the department.

Ten companies are now approved to test robot cars on public streets, essentially turning the roads into corporate laboratories. Since testing began there have been 17 crashes. Under the current regulations, the Department relies completely on the testing company's account of what happened. With the public's safety at stake, it's imperative that a neutral third party investigates any accident involving a robot car. Moreover, the vehicles record video and other technical data that would shed light on what went wrong in a crash. Copies of this vital information should also be made available to the Department.

Consumer Watchdog proposes the regulation covering the reporting of robot car crashes be amended as indicated below:

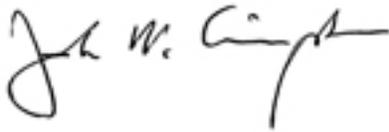
§ 227.44. Reporting Accidents.

A manufacturer whose autonomous vehicle is in any manner involved in an accident originating from the operation of the autonomous vehicle on a public road that resulted in the damage of property or in bodily injury or death shall *immediately report the accident to the police and request an investigation of the accident. In addition to the police report of the investigation the manufacturer will* report the accident to the department, within 10 days after the accident, on Report of Traffic Accident Involving an Autonomous Vehicle, form (OL 316 (NEW 9/2013) which is hereby incorporated by reference. The manufacturer shall identify on the form, by name and current address, if available, all persons involved in the accident, and a full description of how the accident occurred. *In*

addition the manufacturer will provide the department with copies of any video and recorded data related to the accident.

Immediate action is needed to ensure that any accidents involving autonomous vehicles will be reported in an unbiased way. Understanding what went wrong when there are the inevitable robot car crashes is essential to developing necessary regulations for the vehicles. We look forward to your response to this Petition within thirty days, as required by Government Code section 11340.7, and to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Simpson". The signature is fluid and cursive, with a long horizontal stroke at the end.

John M. Simpson
Privacy Project Director
Cc: Brian Soublet, Bernard Soriano