



Aug. 20, 2015

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

Re: "Autonomous Vehicle" Accident Reports

Dear Director Shiomoto:

The Department of Motor Vehicles' decision earlier this summer to redact personal information and release the official autonomous vehicle accident reports has offered the public important insight about what can go wrong with these robot vehicles. More important, however, is that the accident reports' release makes clear a fundamental flaw in the reporting system established by DMV regulations.

The robot car accident reports are prepared and filed by the company doing the testing. Inevitably the companies will present their version of what happened in any crash in the best possible light. As of Aug. 14 there were nine companies with 78 robot cars and 311 drivers approved for testing on California roads.

Google's cars have been involved in the most crashes – 15 – perhaps because they have the most vehicles on public roads. Under the current reporting system the DMV – and the public – must rely entirely on the Internet giant's version of what happened. There is no independent third-party verification. "Trust us, we're Google" simply isn't good enough when our public highways become the company's laboratory.

Consumer Watchdog calls on the department to amend the Autonomous Vehicle Regulations to require that all crashes involving robot cars must be investigated by police, who would interview drivers and witnesses and file an independent report about the incident. Relying solely on the word of the testing company is not adequate to protect the legitimate public interest in ensuring robot cars are tested safely.

In addition the DMV should require that any data and video gathered by a robot car just before and during the crash should be provided to the department. The video and data – with personally identifying information redacted – should be released to the public.

Finally, there is the matter of disengagement reports. The testing companies are required to file reports about when and why the autonomous technology was disengaged and the human driver assumed control. The first reports covering the period from last September through Nov. 30, 2015 are due Jan. 1, 2016. These disengagement reports must be released to the public.

Sincerely,

A handwritten signature in black ink that reads "John M. Simpson".

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