



April 20, 2025

Senator Chris Gorsek
Co-Chair, Joint Committee on Transportation
900 Court St. NE, S-403
Salem, Oregon 97301

Representative Susan McLain
Co-Chair Joint Committee on Transportation
900 Court St. NE, H-493
Salem, Oregon 97301

Dear Chair Gorsek, Chair McClain, and members of the Joint Committee on Transportation,

The Autonomous Vehicle Industry Association (“AVIA”) writes to express our significant concerns with and strong opposition to HB 2671. By imposing a limited and restrictive testing framework for autonomous vehicles (“AVs”), HB 2671 would impede the ability of AV operators to bring the many benefits of AV technology to Oregon. Moreover, by requiring a testing operator to be seated in the driver’s seat of an AV above 10,001 pounds, the bill would effectively ban autonomous trucking operations in Oregon. For these reasons, we respectfully encourage the Committee to ***vote against HB 2671***.

By way of background, AVIA is comprised of the world’s leading technology, ridesharing, trucking, and automotive companies. Our mission is to realize the benefits of autonomous vehicles (i.e., SAE Levels 4- and 5-capable vehicles equipped with automated driving systems that are capable of driving the vehicle without human intervention) and support the safe and expeditious deployment of these technologies. With its broad array of technical expertise and experience in the technology, automobile, and transportation network sectors, AVIA welcomes the opportunity to engage with the Committee to develop the right solutions that will promote the deployment of AVs on Oregon roads.

HB 2671 would cause Oregon to fall further behind other states on AV innovation. If Oregon were to adopt this bill, it would fall behind other states on autonomous technology innovation. The majority of states recognize the many benefits of AVs and authorize driverless AV operations, including autonomous trucks. AVs offer great opportunities, but a framework that allows for the driverless deployment of the technology is necessary to realize these benefits. Instead of creating such a framework, HB 2671 would discourage AV operations in the state by establishing a limited and restrictive testing framework. For example, requiring a testing operator to remain in an autonomous truck would effectively ban these vehicles and deviate from the



overwhelming majority of states' approaches to AV regulation. As another example, the bill would require AV manufacturers to submit reports with details for each “disengagement” experienced by an AV, which is not a meaningful indicator of safety. Similar legislation that was vetoed in California last year estimated a cost of \$16 million to implement in the first year, \$7.6 million in the second year and \$4.4 million annually thereafter to adopt regulations, develop, build and maintain a new IT system to evaluate data that does not contribute meaningfully to safety.

Oregon should support AVs, which will support road safety. AVs are safely operating commercially without a human driver across the country, and they will continue to make our roads safer. NHTSA estimates that nearly over 40,000 traffic deaths occurred in 2023—approximately 100 fatalities per day. These deaths are overwhelmingly caused by human error. Unlike human drivers, AVs do not drive impaired, text while driving, fall asleep at the wheel, or recklessly speed. Oregon should support AV operations precisely *because AVs remove* human error from the equation. Moreover, AVs have built a significant safety record through more than a dozen years of development and deployment, with vehicles operated by AVIA members having driven more than 70 million autonomous miles on U.S. public roads alone. This safety record is supported by data collected and published by the federal government, which requires AV companies to report incidents—no matter how minor or who caused the incident—that occur while an automated driving system is engaged.

AVs can mitigate supply chain challenges. By requiring a testing operator to be physically present in autonomous trucks, this bill would effectively ban such vehicles from operating in Oregon and limit the ability of AVs to help address supply chain challenges facing the state. Autonomous trucks can alleviate supply chain challenges and augment the current truck driver workforce. Federal government data estimates that U.S. freight volume will increase 50% by 2050. At the same time, there is a shortage of truck drivers to move this freight and the problem is set to get worse. Unfortunately, the U.S. trucking industry is currently short of an estimated 78,000 truck drivers due to a long-term decline in new drivers entering the profession, and an annual turnover rate exceeding 90%. The truck driver shortage is estimated to reach 160,000 in 2031. Oregon must find ways to move *more* freight with *fewer* truck drivers to do it. The United States needs truck drivers, and autonomous trucks can help augment the workforce to help solve supply chain challenges for Oregon.

AVs will create new, high-quality jobs. The AV industry is also leveraging the existing workforce to create new roles for different education and skill levels. Many of the jobs created do not require a college degree, such as service technicians, remote assistance operators, mapping data collectors, delivery packers, and more. Workers with experience in the trucking industry specifically, particularly truck drivers, offer valuable skills to AV trucking employers.



In addition, according to a study funded by the U.S. Department of Transportation and Federal Highway Administration, automating long-haul trucking will spur \$111 billion in aggregate investment spending across the U.S. economy, increase total U.S. employment by 26,400 to 35,100 jobs per year on average, and raise annual earnings for all U.S. workers by more than \$200 per worker per year.

AVs will bring economic and environmental benefits. AVs will fundamentally change the manner and speed in which people and goods move in our country while making roads safer for everyone. This technology also presents an array of environmental benefits, including greater fuel efficiency, more efficient use of physical infrastructure, reduced congestion, and reduced agricultural spoilage and related preservation of soil and water resources. Moreover, autonomous long-haul trucking has the potential to broadly benefit the economy by improving the efficiency of countless industries that rely on moving goods on trucks, such as agriculture, retail, and manufacturing.

AVs will usher in a new era of mobility that will make Oregon's transportation system safer, more efficient, and more accessible. We strongly believe Oregon should support safety-enhancing policies without foreclosing a future with AVs. Unfortunately, as drafted, HB 2671 would not support AV operations and would discourage AV companies from investing in this life-saving technology in Oregon. We therefore respectfully strongly oppose HB 2671.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Farrah', is positioned above the typed name.

Jeff Farrah
Chief Executive Officer
Autonomous Vehicle Industry Association