



City of Portland

Office of the
City Administrator
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Deputy City Administrator Public Works Service Area Priya Dhanapal

(She/her) Priya.dhanapal@portlandoregon.gov

Senator Chris Gorsek and Representative Susan McLain, Co-Chairs
Joint Committee on Transportation
900 Court Street, NE
Salem OR 97301

April 23, 2025

Dear Co-Chairs McLain and Gorsek and members of the committee,

The City of Portland writes to express our support for House Bill 2671 and share some suggestions to ensure alignment between state and local priorities. HB 2671 would create a statewide framework for AV testing and permitting. The City understands the need for a statewide framework and would appreciate the chance to continue engaging on this issue and participate in shaping the statewide regulatory framework.

The Portland Bureau of Transportation (PBOT) has been a statewide leader on AVs and established a testing framework and AV permit in 2017. PBOT participated in the Oregon Department of Transportation's (ODOT) [task force on AVs](#) in 2018-2019, as did industry leaders, industry associations, taxicabs, Teamsters, and others. HB 2671 largely aligns with recommendations from the task force, which we support.

We offer the following suggestions for the legislation:

- The statewide framework that would be created by HB 2671 is ambitious. We encourage ODOT and the legislature to fully resource staffing for this work, including engaging with local governments, first responders, industry, and other stakeholders.
- Prior to AV testing beginning in any municipality, training should be provided for all individuals that will need to interact with and manage AVs testing on our streets. This includes training for first responders like firefighters and police officers that may need to respond to collisions or an immobilized vehicle that, for example, has entered or stopped at a first responder scene or construction site and must be removed.



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- A phased approach should be included for cities with large populations. This would allow the locality and ODOT to identify a limited testing geography that can be expanded over time and set fleet size restrictions within municipal limits.
- Robust data sharing requirements should be included. This includes vehicle manufacturers reporting on incidents like traffic citations, collisions, vehicle immobilizations, and parking citations, which are not currently required. Additional categories for data sharing standards can be identified during rulemaking. Municipalities must have a complete understanding of how AVs are operating on their streets, obeying traffic and parking regulations, and interacting with pedestrians, bicyclists, and other drivers during the testing phase. With this data, municipalities can limit AV testing in specific areas or direct improvements there. It is equally important for AVs to be able to receive data from the city about street closures, work zones, or major events.
- Data privacy should be considered to limit collection of environmental information, such as the license plate numbers of other vehicles on the road, people's biometric information like faces and behaviors, and the unique ID numbers of devices via Bluetooth sensors or Wi-Fi hotspots.

Thank you for the opportunity to comment on HB 2671.

Sincerely,

Priya Dhanapal
Deputy City Administrator, Public Works

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