



Pennsylvania Municipal League
President – Danene Sorace, Mayor, City of Lancaster



Pennsylvania State Association of Township Commissioners
President – Sam Valenza, Commissioner, Upper Moreland Township

MEMO

To: Members of the House Transportation Committee
From: Amy Sturges, Deputy Executive Director – Advocacy, PML and PSATC
Date: March 11, 2022
Re: Highly Automated Vehicles – HB 2398

On behalf of the membership of the PA Municipal League and the PA State Association of Township Commissioners, please accept the following comments for the record of the Committee's March 17 hearing on highly automated vehicles (HAVs).

Our members acknowledge that the technological innovation of HAVs is well underway in the Commonwealth. They also agree that HAVs will bring many benefits to Pennsylvania's economy and its citizens.

As PennDOT and the General Assembly work to make Pennsylvania a hub for both testing and deployment of HAVs, it is important to recognize that under this legislation, local roadways are a large portion of the testing ground. Therefore, the impact on local government must be acknowledged and local government must be viewed as a partner in this effort. This impact includes the safety of motorists and pedestrians; the general education of local officials and citizens; and more specifically, the education of local law enforcement.

Our members' primary concern at this time rests with the broad local preemption in the legislation. The current language in Section 8510 is so expansive that we question the ability to even enforce HAV driving under the normal rules of the road. This language must be narrowed and clarified.

Furthermore, a level of local authority should be preserved concerning the testing of HAVs in certain areas of a municipality, such as school zones, construction zones, restricted roadways or any area where local officials believe testing would present a particular public safety concern. Local officials also need to be sure that legislation regarding HAVs will not hinder their current local land use, zoning and public right-of-way authority.

Finally, our members believe the legislation should clearly require direct notification to a municipality when testing without a human driver present in the vehicle will be occurring. This notification does not have to be a specific date and time, but in general, notification that company A is planning to test in the municipality. This is a courtesy that allows both local officials and law enforcement to be on notice.

Local roadways are an important piece in the Commonwealth's HAV testing and deployment. Therefore, local government must be considered a partner with the Commonwealth and the industry in the HAV roll-out. As such, a level of local control must be preserved in order to be successful and continue Pennsylvania's interest in being a leader in the safe deployment of this technology.

Thank you for your consideration. The League and PSATC look forward to having the opportunity for further discussion and input into the language of the legislation before it leaves the Committee.

Please feel free to contact me at asturges@pml.org with any questions or comments regarding our statement.