Automated Transportation 3.0

American Association of People with Disabilities (AAPD) is one of the leading national organizations representing the interests of over 57 million Americans living with a disability. The organization appreciates the opportunity to provide comments to the Department of Transportation on the Automated Transportation 3.0 Policy Summit.

AAPD shares Secretary Chao's belief that "this technology could increase access to transportation especially for our elderly and people with disabilities - they will be gaining back their freedom."

As a leading voice for people with disabilities interested in shaping how autonomous vehicles (AVs) operate at level 4 and 5, AAPD believes these vehicles should operate on public roads as soon as safely possible. Human error is responsible for causing more than 37,000 deaths each year and AVs have the potential to reduce that number significantly while improving access to transportation for people with disabilities. The prompt deployment of these vehicles will allow disabled people that are unable to obtain a driver's license to access transportation in an independent manner removing a degree of dependence that holds this population back from realizing its human potential. Their current transportation options are limited to relying on others or using public transportation systems that rarely provide a reliable on-demand service option that most Americans take for granted. People with disabilities need more reliable transportation options to get their children to school, to go to work, run errands, or go out to see a movie with the family in the evening. Unfortunately, the lack of transportation options keeps these activities out of reach for far too many in the disability community.

To realize Secretary Chao's vision for people with disabilities, the Department should initiate a comprehensive effort to make transportation, particularly passenger vehicles, more accessible. The private sector must play a significant role in addressing accessibility barriers in passenger cars if people with disabilities are to benefit from the deployment of AVs. We appreciate that NHTSA has encouraged industry working on AVs to address the accessibility of the human machine interface, however, AAPD believes that the structural design of passenger cars must incorporate universal design principles for all disabled people to benefit. To that end, AAPD is encouraged to see that the first two voluntary safety reports submitted to NHTSA include information about accessibility for people with disabilities. Our take-away from these reports is that people with sensory disabilities will be the initial beneficiaries of deployed AVs. The lack of a fully accessible passenger vehicle is holding back the promise of this technology for more than 15 million Americans that rely on wheelchairs and other mobility devices. After all, the highest form of independence of mobility for disabled people is an AV that can be used on their own. In contrast, the current market for wheelchair accessible transportation forces many wheelchair users into a dependence on government-operated paratransit systems for their most basic transportation needs. Even when wheelchair users have resources necessary to pay for transportation services, they find them unavailable and resort to the highly-subsidized, government-operated paratransit services.

Assumptions that the market for wheelchair accessible vehicles is static will not serve the nation well as we move toward greater autonomy in transportation. The market is dynamic with growth coming from demographic changes associated with an aging population, which will cause an increase in demand for these vehicles. Another market factor that needs to be considered is retirement income associated with this demographic. Older adults and their families have more money to spend on accessible transportation than an under-65 wheelchair using population. As the demand and the resources available to pay for wheelchair accessible vehicles increases, we urge automobile manufacturers to reexamine their role in producing vehicles to meet the market.

Another factor that will shape this market is increased demand for wheelchair accessible vehicles as the number of transportation service providers using fleets of autonomous vehicles increases. These entities will have obligations under the Americans with Disabilities Act to serve the public. The lack of accessible cars ready to be fitted with automated driving systems is a challenge that must be dealt with in the near term.

AAPD offers these recommendations to the Department to ensure that all people with disabilities benefit from this technological innovation.

1. Convene meetings with: leadership of the major automobile manufacturers operating in the United States; technology companies; and organizations that represent people with disabilities. Stakeholders, with USDOT participation, should discuss the need and plan for fully accessible passenger vehicles to ensure that wheelchair users are not left behind as AVs are deployed on public roads.

2. NHTSA and USDOT should invite companies that make aftermarket modifications to create wheelchair accessible passenger vehicles to meet with: automobile manufacturers; technology companies working on AVs; and representatives from the disability community. Stakeholders should discuss the change in demand for these cars and plan how best to comply with the Federal Motor Vehicle Safety Standards (FMVSS).

3. Invest resources (time and grant dollars) in efforts to encourage automobile manufactures to build fully accessible vehicles using universal design principles.

4. Conduct research into the forces that shape the markets for accessible vehicles sold: for private ownership; to private companies offering transportation services to the public; and to non-profit and public entities administering programs that provide wheelchair accessible transportation.

5. NHTSA should use its authority to grant exemptions from the FMVSS to automobile manufacturers developing fully accessible passenger cars that require minimal aftermarket modifications to transport wheelchair users.