The National Federation of the Blind, the largest organization of blind people in the United States, fully supports the Senate Staff Draft of the AV START Act distributed on December 3, 2018. This bill has the potential to revolutionize travel for all Americans, particularly those who are currently unable to drive due to blindness.

Of particular importance to the National Federation of the Blind, and to all blind Americans, are two provisions: Section 3(c), which prohibits states from issuing operator’s licenses for highly automated vehicles in a manner that discriminates on the basis of disability; and Section 11(f)(2), which establishes and defines a Disability and Limited Mobility Access Subcommittee as part of the Highly Automated Vehicle Advisory Council at National Highway Traffic Safety Administration. Section 3(c) will ensure that the Americans who need these vehicles the most are not prohibited from operating them. Section 11(f)(2) will ensure that the needs of those same Americans are considered during the research and design phases for highly automated vehicles. For these reasons, it is of the utmost importance that these two provisions remain in the bill as it moves through all phases of the legislative process.

The one suggested edit we have for this bill is to make Section 11(f)(2)(A) more specific to blind Americans by changing one word in the phrase, “for people with physical, sensory, or other disabilities.” Here, we urge that “sensory” be changed to “visual.” This minor edit is strictly a matter of emphasis and clarity. Emphasizing “visual” over “sensory” highlights blind Americans, the group that will be the primary beneficiary of highly automated vehicles. Regarding clarity, while it is true that “sensory” disabilities would include blindness, we think it is important to have it mentioned specifically by name. Adding the term “visual” will ensure that the needs of blind Americans are expressly considered in the discussion about the accessibility of highly automated vehicles.
Chairman Thune and Senator Peters  
December 4, 2018  
Page 2

The National Federation of the Blind is proud to be able to contribute to this momentous discussion regarding the future of transportation in our great nation. We recognize that the transportation industry, as a whole, is standing at the next great transition in its long and storied history, and we are anticipating the future of independent and individual transportation as one that includes the blind.

Sincerely,

[Signature]

Mark A. Riccobono, President  
National Federation of the Blind

MAR/jgp

cc: The Honorable Robert Latta  
The Honorable Janice Schakowsky