

September 20, 2018

The Honorable John Thune
United States Senate
511 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Gary Peters
United States Senate
724 Hart Senate Office Building
Washington, DC 20510

The Honorable Roy Blunt
United States Senate
260 Russell Senate Office Building
Washington, DC 20510

Honorable Debbie Stabenow
United States Senate
731 Hart Senate Office Building
Washington, DC 20510

The Honorable Roger Wicker
United States Senate
555 Dirksen Senate Office Building
Washington, DC 20510

Dear Senators Thune, Peters, Blunt, Stabenow and Wicker:

On behalf of United Spinal Association, I would like to thank you for your leadership on the AV START Act, S. 1885. With all the advances in technology, the United States remains a mobile nation. Transportation is the vital link that allows individuals to raise a family and contribute to the economy whether through a job, engaging retail businesses of all kinds, furthering their education and preserving their health from recreation and gym visits to visiting medical professionals. Transportation allows citizens to fulfill their civic responsibilities and obligations as members of their community. In short, a true democracy of transportation depends upon one bedrock principle: equal access. The promise autonomous vehicles hold for people with disabilities, especially those who use wheelchairs, is to open the doors of our transportation democracy to the disability community.

United Spinal Association is the largest non-profit organization, founded by paralyzed veterans, dedicated to enhancing the quality of life of all people living with spinal cord injuries and disorders (SCI/D), including veterans, and providing support and information to loved ones, care providers and professionals. United Spinal has over 70 years of experience educating and empowering almost 2 million individuals with SCI/D to achieve and maintain the highest levels of independence, health and personal fulfillment. United Spinal has over 50,000 members, 52 chapters, close to 200 support groups and more than 100 rehabilitation facilities and hospital partners nationwide including 10 distinguished Spinal Cord Injury Model System Centers that support innovative projects and research in the field of SCI. United Spinal Association is also a VA-recognized veterans service organization (VSO) serving veterans with disabilities of all kinds.

Far too many barriers to transportation exist for the approximately one in every five people, or more than 57 million, who has a disability in the United States.¹ And that national population with disabilities includes more

¹ The Journal of Disability Policy, April 2017, *Public Transportation: An Investigation of Barriers for People With Disabilities*, “[t]he physical accessibility of public transportation increased nationwide following the passage of the Americans With Disabilities Act (ADA) in 1990. Despite removal of many physical barriers within fixed-route systems, significant barriers to overall access of public transportation systems are still widespread.” JDP conducted an online survey of over 4000 individuals which relayed results highlighting significant barriers for people with disabilities who use public transportation and paratransit services.

than 3.8 million veterans with a service-connected disability.² Individuals with disabilities represent approximately 40% of the 15 million people in the United States who have difficulty getting adequate transportation services.³ It is estimated that 560,000 people do not even leave home as a result of transportation difficulties.⁴

As new transportation technologies such as on-demand mobility solutions with autonomous vehicles enter the mainstream, they offer significant potential for reducing transportation obstacles for Americans with disabilities. Autonomous vehicles and associated technologies also offer exciting opportunities for public-private partnerships across diverse sectors in our economy, connecting transportation and technology with healthcare, retail, agriculture, both brick and mortar as well as online, and the list goes on.

But, autonomous vehicles must be designed and developed to be accessible for wheelchair users. Additionally, comprehensive safeguards, sufficient government oversight, and industry accountability are of course essential to both testing and ultimately deploying autonomous vehicle technologies to be accessible for all. Minimum performance standards, cybersecurity and electronics system protections, safety mechanisms requirements and sufficient resources for federal regulatory authorities, including the National Highway Transportation Safety Administration, must be ensured. In addition, establishing an adequate consumer data collection feedback loop along with continued dialogue with disability advocacy stakeholders and expert input from the disability community as well as the United States Access Board is essential to providing equal access to the new frontier of autonomous vehicles.

United Spinal Association believes the AV START Act, S.1885 as amended - with provisions to include the Highly Automated Vehicles Technical Committee which is required to create a working group to address disability and limited mobility access - is a good first step to streamlining national policy in order to begin testing autonomous vehicles and to provide both safety and accessibility for millions of U.S. citizens. If you have any additional questions, you may contact me at (202) 556-2076, x7102 or abennewith@unitedspinal.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Alexandra Bennewith". The signature is written in a cursive, flowing style.

Alexandra Bennewith, MPA
Vice President, Government Relations

² January 2017 survey published by the Ruderman Family foundation, Self-Driving Cars: The Impact on People with Disabilities issued by the Ruderman Family Foundation.

³ [U.S. Department of Transportation & Bureau of Transportation Statistics, 2003.](#)

⁴ *ibid*