
From: Aidan Ali-sullivan <alisullivan@waymo.com>

Sent: Tuesday, November 16, 2021 11:55 AM

To: Griego, Mershawn C, NMDOT <MershawnC.Griego@state.nm.us>

Cc: Annabel Chang <annabelchang@waymo.com>; Allison Drutchas <drutchas@waymo.com>

Subject: [EXTERNAL] Re: Support for 18.24.1 NMAC, Autonomous Vehicle Testing Rule

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hi Mershawn,

Thank you for the opportunity to provide comment on the rulemaking process for Autonomous Vehicles. Please find attached a letter of support for the regulations on behalf of Waymo.

Additionally, in reviewing the regulation language we identified a few minor typos, most of which will likely be caught on a final review of the regulation language. We do, however, suggest making the following minor technical revisions to ensure consistency in industry language:

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- We suggest citing a particular version of SAE International's J3016. This will help to avoid confusion
- in the future about which version applies. More specifically, we'd suggest creating a definition of "SAE J3016" referencing the most recent, April 2021 version. Then, if New Mexico decides to move to a subsequent version in the future, only that one definition
- would need to be updated.
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- In the definition of "Level 1," to align with SAE J3016, we suggest the following revision: "...with
- the expectation
- exception

that the driver performs the remainder of the dynamic driving task.”

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- To align with SAE J3016, we suggest revising the term "Driving Autonomation" to read "Driving Automation."
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- To align with SAE J3016 and the term "Dynamic Driving Task," we suggest revising the term "Dynamic Drive Task Fallback" to read "Dynamic Driving Task Fallback."
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- In the definition of “Minimal Risk Condition,” to align with SAE J3016, we suggest the following
 - revision: “means a stable,
 - stopped condition...”
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- In the definition of “Request to Intervene,” to align with SAE J3016, we suggest the following
 - revision: “means an alert provided by an automated driving system to a driver or fallback-ready user indicating that...”
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- In section 18.24.1.13(D), we suggest the following revision: “The database will include information
 - on crashes, collisions and violations
 - that is
 - are
 - self-reported by the registered autonomous motor vehicle owner.” We suggest this change for clarity given that the list above in this section does not include "violations," "crashes," or "collisions." The proposed revision would allow for the database to include
 - any self-reported information, without creating any risk of ambiguity about what is and isn't required to be reported.
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We look forward to continued collaboration with the Department as these regulations are enacted.

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