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December 17, 2025

Joseph Chapman, Assistant Chief Counsel
Department of Motor Vehicles
Legal Affairs Division
2415 First Avenue, MS C-128
Sacramento, CA 94232-3820

Subject: New Public Comment Letter on Proposed Regulatory Language for Autonomous Vehicles

Dear Assistant Chief Counsel Chapman,

The Silicon Valley Leadership Group (SVLG) thanks you for the opportunity to provide feedback on the Modified Proposed Regulatory Language for Autonomous Vehicles issued by the California Department of Motor Vehicles ("Department").

SVLG is a business association representing innovation companies throughout California, including many that work at various stages of testing and deployment of autonomous vehicles ("AVs"). We appreciate the Department's continued efforts to develop autonomous vehicle policy in our state and help maximize the benefits of the technology for California residents and businesses alike.

Permit Requirements

We appreciate that changes have been made to reduce the instances that will trigger modification mileage requirements; however, there remain instances that would require modified application and associated mileage requirements. We are concerned that changes that seem arbitrary (e.g., changing the day/hours of operation, changing a geographic area without altering the ODD, adding a few local roads, or changing the vehicle make / model) trigger the significant 250,000 autonomous mile requirement.

In addition, the Department still mandates a wide array of changes to result in a permit update (such as changing a training program, adding or removing AVs to the fleet, or changing vehicle registrations or license plates), with each update incurring a \$70 fee. This extensive scope remains a major concern. More clarity is urgently needed regarding the specific criteria that genuinely necessitate an update, as the current broad wording risks becoming incredibly onerous for developers. Furthermore, it is not clear



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how the DMV plans to efficiently manage and process the immense volume of updates that this wide-ranging requirement could generate.

Future Business Models

We appreciate the Department's positive adjustments, including the allowance for autonomous trucks to transport passengers for purposes like demonstrations, the replacement of extensive emergency vehicle testing mandates with a straightforward certification requirement, and the welcome extension of response times for official notices to a "good faith effort within a reasonable time."

However, several issues persist around future business models and how the noncompliance and suspension will work: we urge that AV permits not be suspended automatically based on a motor carrier's related (e.g. maintenance) suspension; we caution against mandated per-vehicle reporting that risks sharing confidential customer data; and we recommend considering various business models and how notices of noncompliance will be received and sent to the DMV.

Operation Design Domain (ODD)

We acknowledge and appreciate the positive changes made to the 25 mph local road prohibition, specifically the revision made to allow autonomous trucks on "direct routes" and the removal of the requirement to list all relevant local roads.

Despite this improvement, concerns remain regarding differential treatment; we question the rationale for outright prohibiting AV trucks from operating in certain areas when human-driven trucks are not similarly restricted, suggesting a process should exist for AV operation where safety can be demonstrated. Additionally, the language surrounding alternate routing contains conflicting provisions.

Reporting Requirements & Safety Case

We appreciate the Department's shift from disengagement reporting to reporting on dynamic driving task (DDT) system failures and the reduced frequency of some reports. However, the general increase in overall data reporting remains highly burdensome for a developing industry.

A key concern is that the substantial amount of data now required—including miles traveled, crash reporting, immobilizations, and harsh braking events—is not contextualized, as no comparative baseline using human-driven truck data has been established. This absence makes it difficult to assess the specific safety benefits or



insights this reporting will provide. Similarly, while the safety case submission may now be subject to third-party validation, the criteria for selecting and qualifying such validators have not yet been publicly defined, creating additional uncertainty.

We are also concerned that the new reporting requirements are extensive and that the proposed implementation timelines do not provide sufficient time for companies to build the necessary systems, processes, and compliance infrastructure.

To support accurate and consistent reporting, we respectfully urge the Department to ensure that no report is due sooner than the end of the month following the close of the reporting period and to issue each reporting template for public comment before finalizing. After the final templates are released, companies should be afforded a minimum six-month lead time before data collection begins under the new requirements. This implementation runway is critical for operational readiness and will help ensure that the data the Department receives is reliable, meaningful, and aligned with the regulation's intent.

Autonomy Indicator Requirements

We reiterate that the National Highway Traffic Administration (NHTSA) and the Federal Motor Carrier Safety Administration (FMCSA) hold the authority to set vehicle design, safety, and operational standards.

We appreciate the revision of the in-cab autonomy indicator requirement to only apply "when the autonomous technology is engaged." However, we are still concerned with the requirement for an in-cab autonomy indicator for heavy-duty AVs where there will be no passenger. First responders generally do not enter the cab of heavy-duty trucks to move them due to CDL requirements and for safety reasons given the high-speed nature of interstates. . This localized requirement impacts interstate commerce and risks creating a burdensome patchwork of requirements across the country.

Law Enforcement Interactions

We acknowledge the improvement in shifting the First Responder Interaction Plan update requirement from a quarterly to an annual basis. However, for long-haul trucking specifically, the requirement to provide regular training to first responders located within the ODD could encompass a vast geographic area. To ensure effective communication without creating an overwhelming logistical burden, developers require flexibility in determining the best methods for sharing this information. Mandating in-person training for all agencies and offices, especially at their request, is impractical; therefore, alternative formats, such as web-based training, should be expressly authorized.



Best regards,



Sincerely,

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