



**AUTO ALLIANCE**  
DRIVING INNOVATION®

**GlobalAutomakers** 

September 4, 2018

Gregory M. Scott  
Executive Director  
Global Alliance for Vehicle Data Access  
1707 L Street, N.W.  
Suite 560  
Washington, DC 20036

Dear Mr. Scott:

This responds to your letter dated August 14th.

The members of the Alliance of Automobile Manufacturers, Inc. (“Alliance”) and the Association of Global Automakers, Inc. (“Global Automakers”), take very seriously the security and integrity of vehicle-generated data and consumer privacy. Our members’ commitment is evidenced by our Consumer Privacy Protection Principles: Privacy Principles for Vehicle Technologies and Services (2014), to which all of our members subscribe, and by the Automotive Information Sharing & Analysis Center, or Auto ISAC, we launched in 2015. See <https://autoalliance.org/connected-cars/automotive-privacy/>, <https://www.globalautomakers.org/advocacy/connected-automation/privacy>, and <https://www.automotiveisac.com>. We encourage GAVDA members to adopt these Consumer Privacy Protection Principles (as applicable), and also to explore whether it would be appropriate for some of your members to participate in the Auto ISAC.

The Alliance and Global Automakers appreciate GAVDA’s support for Section 15 of S. 1885, “*American Vision for Safer Transportation through Advancement of Revolutionary Technologies Act (AV Start Act)*” which was reported from the Senate Commerce, Science, and Transportation Committee last November. As you know, Section 15 would establish a forum for stakeholders to discuss and make policy recommendations with respect to the ownership, control and access to information and data retrieved from highly automated vehicles (“HAVs”) or automated driving systems (“ADS”), while taking into account intellectual property protections, requirements under the Motor Vehicle Safety Act, consumer privacy, cybersecurity, and confidential business information (among other considerations). The Alliance and Global Automakers continue to engage with a wide range of stakeholders affected by the deployment of HAVs and ADS, including the disability community, law

enforcement, transportation planners, state departments of transportation, etc., to better understand how each is impacted and how concerns may be addressed.

We have noted your willingness to participate in a discussion concerning how to assure the security and integrity of vehicle-generated data to protect all road users, as well as your August 15<sup>th</sup> submission to the U.S. Federal Trade Commission. We look forward to finding a mutually-convenient time for our respective organizations to meet and discuss this important, challenging and complicated topic.

Thank you for your interest in how the members of GAVDA may contribute to the safety, security and integrity of our road transportation system.

Sincerely,

ALLIANCE OF AUTOMOBILE MANUFACTURERS

ASSOCIATION OF GLOBAL AUTOMAKERS



Mitch Bainwol  
President & CEO

John Bozzella  
President & CEO