



June 25, 2020

The Honorable Roger Wicker
Chairman
Commerce, Science, and
Transportation Committee
United States Senate
Washington, DC 20510

The Honorable Maria Cantwell
Ranking Member
Commerce, Science, and
Transportation Committee
United States Senate
Washington, DC 20510

Dear Chairman Wicker and Ranking Member Cantwell:

On behalf of the American Highway Users Alliance (Highway Users), a coalition of 300 organizations including companies, trade associations, safety advocacy groups, and motoring clubs that represent millions of motorists and serve as the united voice of the motoring public, **we urge our strong support for continuing the invaluable work and funding for the Driver Alcohol Detection System for Safety (DADSS) Research Program.** The Highway Users has supported the work of DADSS since its inception and hope that the program will be able to complete its important research. If the DADSS Program is ended prematurely, the lifesaving potential of this technology will be dramatically delayed or forever lost because the intellectual property generated will be exposed to blocking patents. Reauthorizing and appropriately funding the DADSS Research Program, therefore, is vital to realizing the significant safety benefits of this technology.

An analysis by the University of Michigan Transportation Research Institute (UMTRI) concluded that, over 15 years, the DADSS technology could help avoid almost 59,000 deaths and approximately 1.25 million nonfatal injuries, as well as an estimated \$342 billion in injury-related costs. Furthermore, the study found the greatest benefit realized among drivers who recently reached the legal drinking age. The magnitude of these benefits illustrates that investment in the DADSS Program at a level sufficient to ensure that this important research may be completed is sound fiscal and safety policy.

While the Highway Users is very supportive of the DADSS Research Program and its efforts to develop this new technology, we are concerned with legislation that would mandate installment of advanced alcohol detection software in future vehicles even though the technology required is still under development and is not ready for deployment. **The Highway Users has concerns with how S. 2604, "Reduce Impaired Driving for Everyone Act" or "Ride Act," places a date certain on development and deployment of an advanced alcohol detection system like DADSS, which fails to consider privacy and civil liberties of law-abiding drivers, and mandates technology in all new vehicles that isn't ready for deployment. It would also eliminate consumers' choice as to whether to purchase the technology.**

To be clear, we are gravely concerned by the continued death-toll caused by drivers under the influence of alcohol (and drugs). However, it is also extremely important that a technology designed to control human behavior not be imposed before it is clear that civil liberties are

protected and the technology works properly – without false positives where law-abiding drivers can't start their cars and false negatives where law-breaking drivers over the legal alcohol limit rely on the technology to make the dangerous assumption that they are safe to drive. Ensuring funding for the DADSS program is vitally important to continue the research needed to get this technology right.

In addition to our concerns about the proposed mandate timeline and technological challenges, we are concerned that requiring the technology on 100% of the new-car buying population may be unreasonable. We also have privacy concerns regarding the government-mandated location identification called for in the bill, how collection and storage of driver alcohol data would work, and who would have the rights to such data.

In addition, we have no information on the ultimate cost of adding the technology to a new car and whether that cost would be significant enough to prevent low-income drivers from affording a new car. Finally, while the legislation assumes the technology can be calibrated exactly to match each State's DUI law, we are concerned that risk-averse manufacturers would reduce their legal exposure by deploying "zero-tolerance" vehicles that would effectively ban driving under the legal limit.

The Highway Users urge your support for the DADSS Research Program but have major concerns with the approach taken in S. 2604 to mandate new technology that is still under development. If you have any questions, please feel free to contact me at lauraperrotta@highways.org or 571-239-0765. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, reading "Laura Perrotta". The signature is written in a cursive, flowing style.

Laura Perrotta
President & CEO