

TRANSPORT CANADA FEEDBACK
AUTOMATED VEHICLES 2: HIGHLY AUTOMATED ROAD PASSENGER SERVICES

Transport Canada (TC) sincerely appreciates the opportunity to review and provide our feedback on *Automated Vehicles 2: Highly Automated Road Passenger Services (HARPS)* produced by the Law Commission of England and Wales and the Scottish Law Commission. The consolidated input presented below is from relevant units throughout the department as well as from Canadian industry associations.

GENERAL

- TC commends the Law Commission of England and Wales and the Scottish Law Commission for putting together this thorough and well thought-out consultation paper. TC appreciates that the discussion questions consider the widespread implications of CAVs.
- TC understands that this discussion deals with how best to integrate and manage CAVs in the UK context, and would be interested in seeing what recommendations emerge from this consultation.
- TC looks forward to the Law Commission of England and Wales and the Scottish Law Commission's third consultation paper, which will be published in 2020.

CHAPTER 2: ACHIEVING WIDER TRANSPORT GOALS

- TC acknowledges the potential benefits of HARPS and notes that while there may be the possibility of reduced congestion, recent studies have shown that ride-sharing services increase congestion. TC is monitoring the introduction of these types of vehicles in order to determine the effect they will have on congestion.
- TC is also eager to see how the introduction of HARPS will affect accessibility. TC agrees that people with disabilities would benefit from ride-sharing services. The introduction of Level 4 automated vehicles may also give people with disabilities as well as the elderly the ability to travel without the need for a driver's license. Accessibility needs must be considered as the concepts for HARPS are developed, to ensure these potential benefits are realized. The Canadian National Institute for the Blind recently published a report entitled [Understanding the Impact of Connected and Automated Vehicles for Pedestrians who are Blind or Partially Sighted](#), that includes considerations for manufactures as they develop automated vehicles.
- In terms of potential risks related to HARPS, TC appreciates that public perception of safety is important. TC would add that the focus should be on safety itself, and regulators have the role of developing appropriate regulations, laws and guidance in order to ensure vehicles meet baseline performance requirements. Like the UK, TC remains concerned with challenges related to rural areas. The vehicle system's ability to navigate these environments will be crucial to ensure the benefits of HARPS can extend to all communities.

CHAPTER 4: OPERATOR LICENSING – SCOPE AND CONTEXT

- TC agrees that any accident or, if possible, incident, should be properly reported. Information contained in the vehicle event data recorder (EDR) or data storage system for automated driving (DSSAD) should be required. TC is actively working with its international colleagues towards defining EDR and DSSAD within the UNECE WP.29 working group focused on these issues (DSSAD/EDR).

CHAPTER 5: PRIVATELY-OWNED PASSENGER-ONLY VEHICLES

- Like the UK, TC remains concerned with the possibility for vehicles to be supervised and updated by individuals. Over the air updates are being implemented by a growing number of manufacturers. TC recognizes that automated vehicles will likely be required to have over-the-air updates rather than specialist intervention, due to the need to keep current with rules of the road. As these updates are deployed, it will be important to ensure they are completed safely and in full while the vehicle is not in use and that cyber security threats are appropriately managed.
- The Canadian Vehicle Manufacturers Association (CVMA) notes that Question 23 in the paper seeks views on whether the safety agency should be under duty to ensure that consumers are given the information they need to make informed decisions about the ongoing costs of owning automated vehicles. As for vehicles currently on the road today, the marketplace ensures that manufacturers are competitive and we caution against regulating information on ongoing costs. As such, CVMA notes that it is not necessary to impose a different approach for automated vehicles and vehicles on the road today.