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SUBCOMMITTEE ON COMMERCE, MANUFACTURING, AND TRADE

Hearing: "Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership"

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Introduction

Chairman Bilirakis, Ranking Member Schakowsky, and Members of the Subcommittee, thank you for the opportunity to testify today.

My name is Hilary Cain, and I serve as Senior Vice President for Policy at the Alliance for Automotive Innovation. Our trade association represents the full spectrum of the automotive industry, including nearly all major automakers and many of the companies and suppliers that invent, design, and build the technologies that make vehicles safer, cleaner, and more affordable for American families.

This hearing comes at an important moment for the U.S. auto industry and for road safety policy more broadly. Vehicles today are more advanced, more connected, and safer than at any point in history. At the same time, affordability pressures are real, global competition is intensifying, and the pace of technological change continues to accelerate.

We are optimistic about the opportunity for a reset. A reset at the National Highway Traffic Safety Administration. A reset in how Congress and regulators think about modernizing safety policy. And a reset that recognizes the unique role the auto industry plays at the intersection of safety, affordability, and global competitiveness.

We look forward to working with this Subcommittee, the full Committee, stakeholders, and NHTSA to modernize laws and regulations to better reflect today's technology, consumers, and global market realities.

The Automotive Industry at the Intersection of Safety, Affordability, and Competitiveness

The automotive industry has long been one of America's greatest engines of innovation. From the introduction of the Ford Model-T to leading the charge for autonomous vehicles, automotive innovation has been integral to advanced manufacturing and economic security of the U.S. Today the industry supports more than 10 million jobs and represents more than 5 percent of GDP.

This commitment to innovation has delivered extraordinary safety and fuel economy gains. Fatality rates per mile traveled have fallen dramatically over the past several decades, even as vehicles have become more powerful, more capable, and more complex. The nation, however, still has a long way to go to address the unacceptable number of fatalities and injuries on U.S. roads. Every year, approximately 40,000 people die on our roads – we must never lose sight of that tragic reality.

At the same time, vehicles are increasingly software-defined products. They integrate advanced driver assistance systems, connectivity, electrification, and automation. These technologies can save lives, reduce crashes, and expand personal mobility. But they also demand a regulatory framework that is agile, predictable, grounded in data, and outcomes based.

When regulation lags behind technology, consumers lose. When rules are fragmented, outdated, or misaligned with global standards, costs rise. And when the United States fails to modernize its regulatory approach, we risk falling behind global competitors who are moving faster and with greater coordination.

That is why reforming and enabling our safety regulator NHTSA, advancing autonomous vehicle readiness, and safeguarding consumers' trust must be core pillars of the coming surface transportation reauthorization.

I. Modernizing Vehicle Safety Regulation Through NHTSA Reform

NHTSA plays a critical role in vehicle safety, but many of its regulatory tools and processes were designed for a different era. Outdated standards, slow rulemaking timelines, and fragmented grant programs are increasingly misaligned with modern vehicle design and real-world safety data.

In some cases, proven safety technologies face years of regulatory delay. These delays do not just slow safety improvements. They also increase costs by forcing manufacturers to

design, certify, and maintain vehicles under outdated standards – costs that may ultimately impact many Americans' ability to afford a new car. In others, legacy standards no longer reflect how vehicles are actually built or how consumers use them. Adaptive driving beams illustrate very effectively why this reform is so needed. Congress directed NHTSA to base the rule on an existing SAE standard, lighting experts and the auto industry petitioned for alignment with global designs, and NHTSA still finalized a rule that leaves Americans unable to access a proven safety technology that drivers overseas have benefited from for years.

This is not a question of commitment to safety. Automakers invest billions of dollars every year in safety research, testing, and deployment. The challenge is that the regulatory framework has not kept pace.

What we propose

We urge Congress to focus on reforms that enable NHTSA to be more effective, more transparent, and more forward-looking:

- Develop a clear, public research and rulemaking roadmap that promotes transparency and alignment.
- Revitalize the New Car Assessment Program, including a robust and sustainable 10-year roadmap, so it continues to provide meaningful, up-to-date information for consumers and appropriately recognizes safety innovation.
- Modernize legacy standards, including those governing automatic emergency braking, vehicle lighting, and bumper design, through streamlined and transparent rulemaking that reflects modern vehicle architecture and global best practices. Aligning standards with modern vehicle design and global best practices reduces duplicative engineering, shortens development timelines, and helps keep vehicles affordable without compromising safety.
- Consolidate and simplify NHTSA's safety grant programs, with dedicated funding to support recall completion efforts and the integration of driver-assist technology education into state driver's education programs and curricula.

These reforms would strengthen vehicle safety outcomes while reducing unnecessary cost and delay.

II. Advancing Autonomous Vehicle Readiness

Autonomous vehicle technology represents one of the most important safety and mobility opportunities of our generation. AVs have the potential to dramatically reduce crashes, expand access to transportation, especially for people with disabilities. But realizing those benefits depends on more than the technology inside the vehicle. It depends on a federal

framework that is modern, coordinated, and centered around safety. Having a robust AV industry helps reinforce U.S. leadership in the next frontier of automotive innovation: innovation that we pioneered and currently lead throughout the world.

First, the United States needs a clear federal framework governing autonomous vehicle development and deployment. Today, the absence of a comprehensive federal AV regulatory framework has left innovators, new and legacy, navigating uncertainty with fragmented oversight and a growing patchwork of state and local requirements. Requirements have even gone down to the hyperlocal level, requiring companies to navigate different regulations on a street-by-street basis. These uncertainties slow investment, delay deployment, and put U.S. leadership at risk. This occurs not in a vacuum but rather as global competitors move aggressively to bring AV technologies to market. Regulatory fragmentation also raises costs by preventing manufacturers from scaling technologies nationally, which could help drive down costs for consumers over time in a variety of use cases.

Far from weakening safety oversight, comprehensive federal AV legislation would strengthen it by establishing clear national standards and accountability and preventing a fragmented, state-by-state approach that risks inconsistent safety expectations and outcomes. NHTSA's authority and charge given decades ago by Congress is to establish clear, national safety guidelines for motor vehicles.

We support recent efforts to advance federal AV legislation such as the bipartisan "Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution (SELF-DRIVE) Act" sponsored by Congressman Latta and Congresswoman Dingell. We need a national framework to provide automakers and technology developers with the predictability they need to innovate, test, deploy, and sell AVs safely at scale, and this bill is a significant step in the right direction. We need federal leadership on vehicle safety to ensure consistent rules and oversight to enable the United States to continue to lead, rather than follow, in autonomous transportation. An important step the bill provides is the creation of a data repository to inform the development of future federal AV-specific performance regulations that are needed.

Federal legislation is not just helpful. It is essential.

At the same time, AV readiness requires alignment beyond vehicle regulation. Today, roadway infrastructure varies widely across states. Lane markings, signage, and traffic management systems are inconsistent and, in many cases, not properly maintained.. At the

federal level, AV-related responsibilities are spread across multiple agencies, often without clear coordination or delineation.

These roadblocks increase complexity, raise costs, and introduce avoidable risk. They also slow AV deployment and weaken America's competitive position globally.

What we propose

Congress should prioritize a layered approach, anchored by federal AV legislation and supported by targeted enabling policies:

- Enact comprehensive federal legislation governing AV development and deployment, such as the "SELF-DRIVE Act," to provide national consistency, preserve federal leadership, and give developers and deployers the certainty needed to lead globally.
- Establish dedicated federal funding to help states and localities modernize infrastructure, including lane markings, signage, and traffic management systems, to better support AV technologies safely.
- Create an Office of Automation within the U.S. Department of Transportation to coordinate AV policy, streamline regulatory oversight, and provide a clear point of accountability across all modal administrations within the Department and the federal government.

Countries like China are advancing autonomous and connected vehicle technologies through coordinated national strategies that align regulation, infrastructure, and deployment. Without a clear federal framework, the United States risks ceding leadership not because our technology lags, but because our policies do. Together, these actions would strengthen safety, accelerate responsible deployment, and ensure that the United States sets the rules of the road for autonomous vehicles rather than reacting to them.

III. A Smarter, Safer Approach to Vehicle Repair: The SAFE Repair Act

Even amid unprecedented innovation across the automotive industry, manufacturers continue to support consumer choice in vehicle repair. Today, approximately 75 percent of post-warranty repairs are performed by independent repair shops, reflecting a competitive and accessible repair market. Automakers have no incentive to restrict where consumers repair their vehicles. If consumers cannot have their vehicles repaired safely and conveniently where they live, brand loyalty suffers in a highly competitive marketplace.

Beyond this market reality, automotive manufacturers have for more than a decade upheld a national Memorandum of Understanding tied to a 2013 Massachusetts law that ensures independent repair shops have access to the same diagnostic and repair information

available to franchised dealers. That commitment remains firmly in place, and manufacturers continue to make the information necessary to repair vehicles available across the repair ecosystem.

Vehicles today are complex, highly integrated systems that rely on advanced software, sensors, and materials. Proper repairs increasingly depend on following manufacturer-developed repair procedures designed to restore a vehicle's original safety performance. When these procedures are not followed, critical safety systems including airbags, crash structures, and advanced driver assistance systems may not function as intended in a subsequent crash.

There are real-world examples of vehicles that appeared to be properly repaired after a collision, only to later experience safety system failures because automaker repair procedures were skipped or incorrect parts were used. In many of these cases, the deviations were driven not by consumer preference or technician judgment, but by insurance reimbursement models that incentivized lower-cost, faster repairs rather than complete and proper ones.

While such shortcuts may reduce costs in the short term, they can compromise vehicle safety, reduce long-term reliability, and ultimately lead to higher downstream costs for consumers through repeat repairs, diminished resale value, or increased risk of injury. In effect, cost-driven repair decisions can shift risk away from insurers and onto consumers and their families without their knowledge or consent.

We appreciate the Committee's attention to this issue. We support the advancement of federal legislation on vehicle repair. However, we continue to have concerns that some existing legislative proposals would require expansive access to vehicle data far beyond what is necessary to perform safe repairs, potentially undermine intellectual property protections, and paradoxically reduce consumer choice by enabling greater insurer influence over repair decisions.

Independent repair shops have been clear about what they need. They are not seeking massive new streams of vehicle data. They want consistent access to the information that already exists. They want to follow manufacturer-recommended repair procedures without being overridden by insurance-driven cost pressures. And they want consumers, not insurers, to remain in control of decisions about how vehicles are repaired and which parts are used.

What we propose: The SAFE Repair Act

To support consumer choice while prioritizing vehicle safety, Auto Innovators supports a legislative framework grounded in the following principles:

- **Affirmation of vehicle data access**: Ensuring consumers and independent repair shops have access to the data necessary to diagnose and repair vehicles safely and properly.
- **Empowering consumers**: Preserving the consumer's right to decide where and how their vehicle is repaired, including the right to insist on automaker-recommended repair procedures.
- **Prioritizing vehicle safety**: Requiring repairs to restore vehicles to their original safety performance by following manufacturer-developed repair procedures, including required scans, calibrations, and structural repairs.
- **Offering parts choice with transparency**: Ensuring consumers can choose between automaker and non-automaker parts, with clear disclosure regarding safety performance, warranties, and recall protections.
- **Protecting aftermarket choices**: Extending equivalent recall and safety protections to aftermarket parts so consumers can make informed decisions.
- **Enhancing transparency**: Requiring disclosure of prior repairs, alterations, or deviations from automaker procedures so consumers and future buyers understand a vehicle's repair history.
- **Promoting inspection programs**: Supporting periodic safety inspections and post-collision inspections to confirm repairs were completed correctly and safety systems function as intended.

It is important to be clear about what the SAFE Repair Act does not do. The legislation does not limit repair access or favor franchise dealers over independent repair shops. Independent repairers retain full access to the information needed to diagnose and repair vehicles. The proposal preserves competition while strengthening consumer data protections and reinforcing safety standards.

The SAFE Repair Act also establishes stronger guardrails around consumer data privacy and cybersecurity, grounded in principles of transparency, data minimization, and meaningful consumer consent. Importantly, it is supported not only by automakers, but by national and state automotive repair and collision professional organizations representing the independent technicians who perform repairs every day.

Finally, by codifying consumer choice and safety-first repair standards, the SAFE Repair Act addresses the growing influence of insurer-driven repair steering. Repair decisions should

be guided by safety and technical requirements, not reimbursement formulas. This approach protects consumers, strengthens confidence in vehicle repairs, and supports safer outcomes on our roads.

We look forward to continuing to work with Dr. Dunn, the Members of the Committee, and other stakeholders to advance a responsible, balanced federal approach to vehicle repair.

IV. Risks of Overreach in Automotive Policy

As Congress considers legislative proposals affecting motor vehicles, there is an opportunity to protect hard-won safety gains while continuing to encourage innovation and consumer choice. Automotive policy is most effective when it is informed by real-world data and aligned with how vehicles are designed, tested, and brought to market. A disciplined, thoughtful approach helps ensure that well-intentioned policies do not inadvertently undermine safety, affordability, or consumer trust.

Meeting consumers where they are

Effective safety policy recognizes that consumer understanding and acceptance are critical to successful deployment. Mandating technologies that consumers do not understand, do not trust, or are not ready to accept can be counterproductive. The auto industry invests heavily in research, testing, and consumer education to ensure new technologies are introduced responsibly and effectively.

History shows what can happen when policy runs too far ahead of public readiness. In the 1970s, a federally mandated seatbelt starter interlock prevented vehicles from starting unless seatbelts were fastened. While well-intentioned, the policy sparked widespread public backlash and ultimately led Congress to repeal the requirement. The result was not faster adoption of seatbelt use, but a loss of public trust and a setback for broader safety efforts.

Policies that move faster than consumer readiness risk undermining confidence and slowing the adoption of life-saving safety innovations over the long term. The most durable safety gains come from pairing strong standards with consumer education, transparency, and time for understanding, not from mandates that get ahead of the people they are meant to protect.

Preserving a coherent regulatory framework

Automotive safety regulation has long relied on a structured, technical process led by NHTSA. Vehicle development operates on long product planning cycles that require

predictability, coordination, and sufficient lead time. One-off legislative mandates that disrupt these cycles can significantly increase development and compliance costs, making vehicles more expensive without delivering corresponding safety benefits.

Frequent statutory changes – particularly those that bypass technical review or lack sufficient implementation timelines – raise costs, create uncertainty, and can be difficult or impossible to implement as intended. These dynamics can also result in Congress mandating requirements that are already under active consideration within NHTSA's research, NCAP updates, or rulemaking pipeline.

Greater transparency and clearer public roadmaps from NHTSA regarding research priorities, NCAP evolution, and upcoming rulemakings would benefit all stakeholders. Clear visibility allows Congress to focus on oversight and policy direction rather than duplicative mandates, while enabling manufacturers to align development, testing, and production planning more efficiently.

Meaningful and durable reform happens when Congress, NHTSA, and industry work together within a coherent, predictable framework that emphasizes technical rigor, transparency, and coordination. This approach strengthens safety outcomes while avoiding unnecessary cost, confusion, and delay.

Protecting consumer data and privacy

Automakers have long been committed to protecting consumer privacy and vehicle data. Demonstrating this commitment, the auto industry proactively developed the Privacy Principles for Vehicle Technologies and Services in 2014, which were submitted to, and are enforceable by, the Federal Trade Commission.

The Principles contain significant commitments related to transparency, choice, respect for context, data minimization, data security, integrity, and accountability that are supported by standards bodies and best practices in industries beyond automotive. The Privacy Principles provide heightened protection for the most sensitive types of consumer information, for example, those relating to geolocation, driver behavior, and biometrics.

As noted to the Committee in our response to the House Data Privacy Working Group's February 2025 Request for Information, we support the enactment of strong federal privacy legislation that promotes innovation while providing:

- Robust consumer privacy protections that are supported by transparency and consumer choice;
- Clear controller obligations that provide regulatory certainty and accountability without impeding industry's ability to ensure product safety, meet customer needs, and advance innovative technologies;
- Strong federal preemption to provide consistent and predictable rights and responsibilities across all jurisdictions; and
- Appropriate enforcement mechanisms.

Proposals to require unrestricted access, deletion, modification, or transfer of vehicle data to third parties that do not follow the same standards pose an unacceptable risk to consumer privacy, vehicle safety, and automakers' intellectual property. We look forward to continued discussions regarding how to best advance consumer data privacy in the automotive context.

Conclusion

The upcoming surface transportation reauthorization presents a real opportunity. An opportunity to modernize vehicle safety policy, strengthen consumer choice and affordability, and ensure the United States remains globally competitive in an industry increasingly defined by innovation and speed.

Other countries, particularly China, are moving with incredible speed, coordination, and scale to dominate the global automotive market. Auto companies doing business inside the United States face geopolitical and market pressures from China challenging America's global competitiveness.

By contrast, the greatest risk to U.S. competitiveness is not a lack of innovation, but fragmented policy, regulatory delay, and uncertainty that slow our ability to bring safe, clean, affordable technologies to market.

The surface transportation reauthorization is the right legislative vehicle to address these challenges. Congress can use this moment to modernize NHTSA's safety framework, establish durable federal leadership on autonomous vehicles, and advance consumer-focused repair and data policies that strengthen public trust without sacrificing innovation, privacy, or affordability.

We believe in the ability of the auto industry in the U.S. to deliver safer, more affordable vehicles for consumers. With the right policy framework grounded in data, consumer trust, and collaboration, the U.S. can continue to lead.

We look forward to working with this Subcommittee, the full Committee, and NHTSA to get it right.

Thank you, and I look forward to your questions.