



The Honorable Elaine L. Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Ave. SE
Washington, DC 20590

August 16, 2020

Dear Secretary Chao,

Thank you for the opportunity to provide input on the Department's proposed Accessibility Strategic Plan. May Mobility, an Ann Arbor, Michigan-based technology and mobility operator of autonomous shuttles, shares the Department's dedication and commitment to making the nation's transportation system accessible to all Americans and we believe that the Department has done a great service to the federal government and to industry by developing a clear, comprehensive, and transparent plan for ensuring that the future of mobility is created with the mobility needs of all at the forefront and not as an afterthought.

In particular, the Strategic Plan's overarching themes of Partnerships and Innovation are welcomed from the technology and operations sector. We know that there is still much work to be done to develop the full suite of innovations necessary for fully accessible autonomous mobility. These technological breakthroughs will only be possible with the Department's leadership and collaboration with industry and researchers at the nation's leading institutions.

Goal 3

May Mobility is pleased to see that DOT has used the Strategic Plan Framework as an opportunity to address "barriers for people with disabilities to seek licensure for, operate, and/or ride in passenger and commercial vehicles" in Goal 3. May Mobility believes that automated vehicles can play a key role in addressing these barriers by providing improved transportation independence and mobility options to people with disabilities.

May Mobility applauds the funding of the development of specific AV accessibility standards. We believe this time of increased innovation in vehicle design could be a valuable opportunity in evaluating and developing universal securement systems, improving crashworthiness of vehicles for all applicants, and more.

May Mobility also appreciates DOT's initiative in creating the online database of standards and best practices in accessibility of automated vehicles. This will be a helpful resource for industry players to leverage the knowledge and experience of others in industry and throughout the disability community and public sector in developing accessible automated vehicles.

DOT has a vital role to play in facilitating the development of accessible automated vehicles by providing funding and facilitating collaboration in the development and piloting of automated vehicle technologies and relevant accessibility features. May Mobility believes it is important that accessibility is considered in parallel



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with the development of the core automation technologies. It should not be left for the end or a “last step” to consider how to make these vehicles and services accessible.

Conversely, industry players should also not be required to have conclusively solved problems of accessibility before testing the technologies. Testing of the technologies will be necessary to give the disability community the opportunity to react to the technology and provide vital input on vehicle and station design, HMI, and other factors. Companies developing advanced vehicle technologies should consider accessibility throughout the design process, but should be allowed flexibility in exactly how they solve accessibility challenges as they iterate on potential technological solutions and improvements. Testing and development of automation technologies and accessibility features, in parallel, will be vitally important to the ultimate goal of developing safe, accessible automated vehicle technologies.

Goal 4

May Mobility enthusiastically supports Goal 4 in improving transit accessibility for people with disabilities, including in facilities, service, and vehicles. We strongly believe in the potential of automated vehicle technologies to serve as a crucial part of public transit systems of the future. Automated shuttles will require new technologies and approaches to accessibility including in wheelchair securement, potentially revised facility designs, navigating potentially dynamic service options, and HMI accessibility. Research & development and pilot programs will be crucial to developing the technologies and conducting the outreach to and testing with the disability community necessary to ensure automated public transit systems are accessible for people with disabilities. DOT should fund grant programs to enable and encourage testing and development of accessible automated technologies and supporting features in public transit.

Thank you again for this opportunity to work with the Department and the broader stakeholder community to develop and deploy accessible mobility solutions. We look forward to being a partner in this endeavor.

Sincerely,

Erin McCurry
Product Manager, Accessibility
May Mobility