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December 18, 2025

Steve Gordon, Director
Joseph Chapman, Assistant Chief Counsel
California Department of Motor Vehicles
Legal Affairs Division
2415 First Avenue, MS C-128
Sacramento, CA 95818

Re: Proposed Regulatory Text – Article 3.7 & Article 3.8

Dear Director Gordon and Assistant Chief Counsel Chapman:

On behalf of the Consumer Technology Association (CTA) and our more than 1200 member companies, we appreciate the opportunity to comment on the Department of Motor Vehicles' revised autonomous vehicle (AV) regulations. CTA supports the Department's goal of establishing a clear, safe, and workable pathway for AV testing and deployment in California, including for heavy-duty vehicles.

California's leadership in technology makes a predictable regulatory process essential. The creation of formal testing and deployment pathways is an important step forward, and we recognize the Department's extensive work, public engagement, and commitment to providing needed certainty for companies seeking to innovate in the state.

However, we are concerned that several provisions, taken together, will impose burdens that are impractical for companies to meet. Layered administrative and operational requirements, without corresponding clarity, could slow deployment, discourage investment, and limit participation to only a few firms able to navigate a highly complex framework. CTA strongly supports safety, transparency and accountability; our concern is ensuring the structure is workable and meets the industry where it exists today – with real-world operational deployments currently underway.

We respectfully urge the Department to continue close collaboration with industry experts as it finalizes and implements the regulations. The collective expertise of companies developing and deploying this technology is invaluable for ensuring the final rules are practical, technically feasible, and capable of fostering continued innovation. Ongoing technical dialogue and practical guidance will help ensure the rules advance safety while supporting responsible deployment of autonomous technologies in California.

CTA and its members value California's leadership and remain committed partners in promoting safe, innovative transportation solutions. We appreciate your consideration and look forward to continued engagement as this process moves ahead.

Sincerely,

CONSUMER TECHNOLOGY ASSOCIATION

/s/ J. David Grossman

J. David Grossman
Vice President, Policy & Regulatory Affairs

/s/ Samuel Negatu

Samuel Negatu
Director, Government Affairs