



February 4, 2026

The Honorable Ted Cruz
Senate Committee on Commerce, Science &
Transportation
254 Russell Senate Building
Washington, DC 20510

The Honorable Maria Cantwell
Senate Committee on Commerce, Science &
Transportation
254 Russell Senate Building
Washington, DC 20510

RE: Letter for the Record for the Hearing titled “Hit the Road, Mac: The Future of Self-Driving Cars”

Dear Chairman Cruz and Ranking Member Cantwell:

The undersigned members of the Consortium for Constituents with Disabilities (CCD) Transportation Task Force and friends write to submit a letter for the record for the February 4, 2026 hearing titled “Hit the Road, Mac: The Future of Self-Driving Cars”. As noted in the hearing announcement, autonomous vehicles (AVs) have the potential to save lives and could also “significantly expand mobility and independence for people with disabilities who are unable to drive, improving access to employment, healthcare, and the community.”

CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of people with disabilities. The Americans with Disabilities Act (ADA) sought to “provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Through AV policymaking, Congress has the opportunity to lead, uphold the ADA’s mandate, enhance safety, and improve lives and mobility for all.

To ensure people with disabilities benefit from AVs, the vehicles must accommodate passengers who remain in their wheelchairs, the human machine interface (HMI) must be accessible for people with sensory and cognitive disabilities, and AVs must be able to detect all types of disabled pedestrians. Access and safety for disabled passengers is not addressed in the discussion draft of the House SELF DRIVE Act of 2026. To ensure American leadership in AVs and automated driving system (ADS)-equipped vehicles, we urge you to consider and prioritize the safety and access needs of disabled passengers and pedestrians. We are also providing *“Disability Access in AVs and Motor Vehicles”* draft bill text (Access in AVs Draft) for your consideration.

Background

Nearly 1 in 5 people in the U.S. has a disability (more than 57 million). In addition, many older adults who acquire short or long-term disabilities or health conditions in both rural and urban settings will need accessible transportation options to access healthcare and remain active in their communities. The ADA was passed in 1990 yet significant barriers remain to accessible, affordable transportation.

Many people with disabilities cannot drive because of their specific disability, are currently unable to obtain a driver's license, are denied transportation services, or cannot afford to purchase a wheelchair accessible vehicle (WAV).¹ It's critical that ride-share and on-demand services provide disability access, yet there are not adequate WAVs, and trip denials for service animal users and other people with disabilities are rampant. There are no purpose-built wheelchair accessible passenger vehicles on the market today in the United States. Wheelchair users often pay nearly double the price of the vehicle for necessary aftermarket modifications, including to have a ramp installed or other features that require exemptions from the FMVSS.²

Without affordable, accessible transportation, people with disabilities are unable to travel to work, to school, to contribute to and participate in their communities, to support and spend time with family and friends, and live their lives to the fullest. A report by the National Disability Institute found that a critical barrier to competitive integrated employment and entrepreneurship is a lack of accessible transportation options. Accessible, affordable, and sustainable AVs could lead to an additional 4.4 million jobs for people with disabilities, an additional \$867 billion in U.S. GDP, and \$1.6 trillion in U.S. output.³

Disability AV Advocacy and Engagement

The CCD Transportation Task Force has a track record of advocating for fully accessible AVs through adoption of cross-disability AV Principles and providing feedback on past AV legislative drafts.^{4,5} Many of our members also participated in three days of AV accessibility workshops in 2019 hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation) with government, industry and disability stakeholders, and U.S. Department of Transportation (USDOT) and U.S. Department of Labor (USDOL) listening sessions.^{6,7}

Manufacturers and transportation providers are developing, testing and deploying autonomous shuttles and passenger vehicles. We acknowledge AVs have the potential to dramatically improve access for people with disabilities. However, *the promise and safety of AVs will only be realized if the vehicles and the surrounding infrastructure are fully accessible, and the safety elements consider the needs of all people with disabilities.*

Recommended AV Legislation Provisions to Ensure Disabled Traveler Access & Safety

Licensing and Insurance – Legislation should prohibit discrimination on the basis of disability by

states and any other governmental authorities in licensing and insurance.

Highly Automated Vehicles Advisory Council – An Advisory Council comprised of industry, consumer, safety, labor, civil rights and other stakeholders is necessary to continue discussions and identify barriers, unintended impacts and solutions. Disability representation is critical and should be included within any advisory council, and the Council should also be required to consider accessibility needs.

Disability Inclusive Safety Case, Frameworks and Self-Assessment Rulemakings – Safety case or self-assessment requirements should include accessible HMI that would ensure accessibility for people with sensory and cognitive disabilities, as well as physical accessibility of the vehicle for wheelchair users. We also support including ADS detection of and appropriate response to any vulnerable road user and strengthening this language to ensure a broad range of disabled and other road users are detected. A Disability Rights Education & Defense Fund brief on ableism in AV AI and algorithms recommends standards be set to ensure AVs can detect all people with disabilities and other members of marginalized communities outside the vehicle.⁸ Research and recent anecdotes suggest that not all AVs are being taught to detect people seated in their wheelchairs, service animal users, or people with darker skin tones, among others. The Access to AVs Draft requires a safety rulemaking for accessible AV HMIs and a rule for automated driving systems (ADS) to assess and validate the performance of sensing, perception, and response to disabled people outside the vehicle.

A mandate from Congress for all AV-related rulemakings to consider the needs of disabled travelers would ensure inclusion. The vehicle's ADS HMI and object detection outside the vehicle are critical components in any safety framework.

Updating Existing FMVSS Standards – Existing FMVSS must be updated to ensure the safety of AVs, including level 4 and 5. We strongly encourage Congress to require USDOT to include a review of how updated FMVSS will ensure the safety of fully accessible AVs, including those that are both electric and autonomous, and are built with wheelchair ramps and will require testing and deployment of automatic securement systems.⁹ The federal safety framework must assume deployment of, and advance progress toward, fully accessible passenger vehicles (both large and small) as well as accessibility standards. These standards will not only increase public trust of AVs, but also a roadmap for those in the industry seeking to develop and deploy the safest, most accessible vehicle.

Examples of FMVSS related standards that require attention for passenger-related accessible ergonomics are active suspension and kneeling capabilities for level entry, vehicle doorway height and width for entry, rear passenger entry for ambulatory self-or assisted passenger transfers, passenger restraint systems, ramps and mobility equipment securement, and grab assistance throughout vehicles that allow for perpendicular movement. Any updates to the FMVSS must maintain the current exemptions to crashworthiness for modified vehicles to install a ramp until vehicles are fully accessible and such modification is no longer required for physical access. The Access to AVs Draft requires a standard for automated restraint systems

for wheelchair users and ramps and ramp installations.

Preemption – Overly broad preemption provisions may unintentionally restrict AV accessibility or equity performance measures or requirements at the state or local level, including state laws that would mandate vehicle environmental standards to mitigate harm. While we understand the need for federal standards of vehicle design and construction, we also encourage allowing states and local jurisdictions to seek higher performance requirements that also ensure the greatest access and benefits for disabled and other historically underserved travelers. Many cities like New York City, Chicago, and San Francisco have taken the lead in requiring accessibility from rideshare providers and taxis. Their leadership and innovation for service needs to continue to be allowed and local and state levels. The Access to AVs Draft bill prohibits discrimination on the basis of disability by AV operators that would protect the rights of disabled passengers and pedestrians should preemption be included.

Forced Arbitration – We strongly encourage inclusion of a prohibition on forced arbitration clauses in any AV framework. AV providers must be held accountable for injuries and property damage, and remedies available under applicable civil rights laws must be made available.¹⁰ Disabled passengers repeatedly face discrimination from rideshare and micromobility services and disabled pedestrians and cyclists routinely have dangerous interactions with vehicles in public streets and rights of way. The rights of disabled travelers should be protected to ensure a safe and quality experience. In order to fully protect their rights, all disabled people must have the option to take their claims, including those under civil rights laws and the ADA, to court. Should forced arbitration be allowed, we urge upholding disabled travelers' rights. The Access to AVs Draft bill includes a provision and language limiting forced arbitration when involving death or injury of a disabled person, unfair practices affecting a disabled person, and harm to wheelchairs or service animals.

Crash Data – Required industry crash data should include whether vulnerable road users such as pedestrians or wheelchair users were involved. Whether assistive devices such as wheelchairs, walkers, or service animals were damaged or harmed should also be included.

USDOT Personnel and Staffing, Resources for Development – We strongly encourage funding and identification of staffing and resource needs required to ensure accessibility and safety are prioritized in the development of AVs, as well as creating a department within the Center for Excellence, or a separate center, focused on accessibility of AVs. We also encourage the hiring of experts with disabilities who bring their own lived experience and informed perspective.

Infrastructure Data and Considerations – For travelers with disabilities to safely utilize, enter and exit an AV the surrounding infrastructure must be accessible. When data is collected through mapping or other means, AV service providers and government entities should collect and share infrastructure accessibility information, including areas where pick-ups and drop-offs may be unsafe. This data could then be used to identify necessary improvements.

Privacy – Passengers' health, disability status, and locations visited must not be shared or used

for commercial or tracking purposes without the permission of the individual.

U.S. Access Board AV Standards Mandate – The U.S. Access Board currently provides accessibility guidelines and standards for policymakers and industry for transportation vehicles including buses and vans, rail cars and automated guideway vehicles and public rights of way.¹¹ There are currently no federal accessibility standards for fully accessible AV passenger vehicles. USDOT has on their Inclusive Design Challenge webpage a list of existing standards, e.g., wheelchair securement, that may be used as a guide for the time being.¹² There is also a summary report from the Alliance of Automobile Manufacturers-hosted *AVs and Increased Accessibility* workshops that identifies accessibility needs in detail.¹³ However, these do not hold the same weight, nor are they enforceable.

A mandate for the U.S. Access Board to draft AV standards is critical in any legislative framework. In addition, including a deadline within which the Department of Justice and USDOT must adopt the standards and providing sufficient funding for the Access Board to develop the standards is necessary.

Thank you for your consideration. Please contact CT Tyson at ctyson@dredf.org and Sarah Malaier, smalaier@afb.org, with any questions. We are eager to support your efforts to enhance safety and mobility for all.

Sincerely,

CCD Transportation Task Force Co-Chairs

Danica Gonzalves, Paralyzed Veterans of America, danicag@pva.org
Sarah Malaier, American Foundation for the Blind, smalaier@afb.org
Tyler Beck, Epilepsy Foundation of America, tbeck@efga.org

Signatory Organizations

Access Ready

American Association of People with Disabilities

American Council of the Blind

American Foundation for the Blind

American Printing House for the Blind

Autistic Women & Nonbinary Network

Christopher & Dana Reeves Foundation

Deaf Equality

Disability Belongs

Disability Rights California

Disability Rights Education & Defense Fund

Easterseals

Epilepsy Foundation of America

Muscular Dystrophy Association

National Council on Independent Living

National Disability Institute

Paralyzed Veterans of America

TDIforAccess

United Spinal Association

¹ A Bureau of Transportation Statistics (BTS) study of adults with disabilities found that roughly half of respondents 18 to 64 reported living in a household with income under \$25,000. Bureau of Transportation Statistics (2018). Travel Patterns of American Adults with Disabilities. Available at <https://www.bts.gov/travel-patterns-with-disabilities>.

² The aftermarket modifications for wheelchair accessibility are vitally important for the ability of wheelchair users to travel outside their homes. However, wheelchair users face an uncomfortable tradeoff between that access and their safety since the modifications may decrease the overall crashworthiness of the vehicle. People with disabilities regularly choose access over safety. This tradeoff exists because neither manufacturers nor NHTSA have obligations to make today's passenger vehicles both safe and accessible to all people with disabilities and fail to do so voluntarily. As long as this tension exists, nothing in the proposed legislation should diminish access to after-market modifications of vehicles to provide vehicle access to people with disabilities.

³ National Disability Institute (December 30, 2022). Economic Impacts of Removing Transportation Barriers to Employment for Individuals with Disabilities Through Autonomous Vehicle Adoption. Available at <https://www.nationaldisabilityinstitute.org/reports/autonomous-vehicle-adoption/>.

⁴ Consortium for Constituents with Disabilities Transportation Task Force Autonomous Vehicle Principles, updated May 2022. Available at <https://www.c-c-d.org/fichiers/CCD-Disability-AV-Framework-Hearing-Letter-072523-FINAL.pdf>.

⁵ CCD Transportation Task Force August 23, 2019 feedback on AV Bill Issues, including disability access, advisory committees, rulemakings, exemptions, privacy, safety evaluation reports and accessibility features, crash data, resources for NHTSA, consumer education, studies examining potential impacts, and infrastructure available at <https://www.c-c-d.org/fichiers/CCD-Transpo-TF-Feedback-on-AV-Bill-Issues-082319.pdf>. November 4, 2019 Feedback on AV Legislation Sections, including on a HAV advisory council, and disability exemptions available at: <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-110419.pdf>. December 9, 2019 Feedback on AV Legislation Sections, including on new FMVSS and licensing and insurance available at <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-120919.pdf>. February 21, 2020 Feedback on AV Legislation Sections, including on consumer education, cybersecurity, personnel and staffing, and additional considerations available at: <https://www.c-c-d.org/fichiers/CCD-AV-Sections-Response-02-21-20.pdf>.

⁶ Autonomous Vehicles and Increased Accessibility Workshops (May 3, July 19, September 10, 2019). Hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation). Washington, D.C. Summary Report, agendas and presentations available at <https://www.autosinnovate.org/avaccessibility>.

⁷ U.S. Department of Labor (October 2019). Autonomous Vehicles: Driving Employment for People with Disabilities. Available at <https://www.dol.gov/odep/topics/AV-Info-Guide-Revised.doc>.

⁸ Ian Moura for the Disability Rights Education and Defense Fund (November 2022). Addressing Disability & Ableist Bias in Autonomous Vehicles: Ensuring Safety, Equity & Accessibility in Detection, Collision Algorithms & Data Collection. Available at <https://dredf.org/addressing-disability-and-ableist-bias-in-avs/>.

⁹ The industry's safety standards for independent wheelchair securement and passenger restraint should be adopted by NHTSA and integrated into the FMVSS.

¹⁰ We support provisions prohibiting some predispute arbitration claims. We also encourage remedies available under applicable civil rights laws be included.

¹¹ The US Access Board is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. Learn more and review the guidelines and standards they have developed at <https://www.access-board.gov/>.

¹² US Department of Transportation Inclusive Design Challenge Resources. Available at <https://www.transportation.gov/inclusive-design-challenge/resources>.

¹³ Autonomous Vehicles and Increased Accessibility Workshops (2019). Available at <https://www.autosinnovate.org/avaccessibility>.