



VEHICLE AUTOMATION FACTORS GROUP CHAIRMAN'S FACTUAL REPORT
ATTACHMENT 7:

Approved Import Permit

Las Vegas, NV

HWY18FH001

(5 pages)



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

Box 7
AP-1708-025
PM-07-1708-0305

September 18, 2017

Mr. Yves D. Gagnon



St-Colomban, QC, J5K 0C1

Francis Julien

Keolis Transit America Inc.



Los Angeles, CA 90045

Dear Messrs. Gagnon and Julien:

This is in response to the request of Keolis Transit America Inc. (Keolis) for permission to import the vehicles identified below for research and demonstration purposes:

2017 NAVYA ARMA Driverless Shuttle Vehicles

VINs:  and 

This letter revises and replaces a letter on the same subject dated September 15, 2017. The revisions change the duration of the pilot testing program in which the vehicles will be engaged, better define the area in which the pilot testing program will be conducted, and note that the area will not be closed to public traffic.

In your application to import the subject vehicles, you described the NAVYA Arma as an electric-powered fully autonomous vehicle that can accommodate up to 15 passengers and that has an operating speed of approximately 15 miles per hour (mph) and a maximum speed capability of approximately 27 mph. You stated that these vehicles would be used in a pilot testing program to be conducted from October 16, 2017 through October 14, 2018 on the streets of Las Vegas, Nevada. The program will be conducted within a three-block area bounded by Fremont Street, North Las Vegas Boulevard, East Carson Avenue, and North 8th Street, which will not be closed to public traffic. Members of the public would be allowed to board and ride on the vehicles during the pilot testing program.



<http://www.nhtsa.dot.gov>

The purpose of the program is to ensure the full integration of the driverless shuttle into the city traffic grid and related IT infrastructure. Objectives would include traffic light and sign recognition, coordination of road openings in response to emergency vehicles circulating in the area, and the sharing of traffic data to enhance the efficiency of vehicular and pedestrian traffic. The program will allow the City to gather a robust estimate of user demand and ridership for this mode of transportation, and permit the operator to gain a fuller understanding of pedestrian behavior to assist in the development of a larger scale deployment, while presenting the technology in a favorable light to the public. You note that riders would not only benefit from a system that increases their ability to transit across an area, but also from their ability to do so with an increased degree of predictability.

You state that drivers who have been trained in all aspects of the vehicles' operation, including potential safety concerns, will be in the vehicles whenever they are being operated. The drivers will be located in a position where they can take control of the vehicles if needed. The vehicles are fully equipped for such use in a manual mode. In addition, there are emergency stop buttons in the passenger compartment that allow anyone on board the vehicles to bring them to a complete stop.

Keolis has obtained autonomous vehicle testing permits for each of the vehicles from the State of Nevada Department of Motor Vehicles. The permits authorize the vehicles' use only in urban environments, but not on interstate or State highways, or in residential areas. As a condition for obtaining the permits, Keolis secured automobile liability insurance with a combined single limit of \$5,000,000 for each occurrence and excess liability insurance in the amount of \$10,000,000 for each occurrence.

In an e-mail message dated August 29, 2017, you stated that one of the vehicles Keolis wishes to import (VIN [REDACTED]) is scheduled to be delivered to the APTA Expo in Atlanta, Georgia and will be demonstrated at this trade show from October 8, 2017 until October 11, 2017, after which the vehicle will be shipped to the Las Vegas pilot site. This vehicle will be operating inside the Georgia World Congress Center in a dedicated space of 18,000 sq. ft. in Hall B1 with a full-time operator on board during the demonstration. You stated that the vehicle demonstration will not be conducted on any public roads.

Based on the information you provided, as detailed above, we have no objection to your request, and will permit entry of the vehicles under Box 7 on the HS-7 Declaration form, subject to the conditions specified below. Please note that these conditions are typical of those we identify for vehicles that employ novel technologies that are imported for testing purposes that could involve operation on public roads or use by the general public.

1. The grant of permission in this letter applies only to the vehicles identified in the opening paragraph (VIN [REDACTED] and [REDACTED]), hereinafter referred to as "the subject vehicles." If Keolis seeks to import any additional nonconforming vehicles for research or demonstration purposes, regardless of whether they are the same model as the subject vehicles, it will need to separately request NHTSA's permission to import those vehicles, and to obtain NHTSA's permission before the vehicles are imported.

2. Entry of the subject vehicles must be in compliance with all U.S. Customs and Border Protection (Customs) requirements. A copy of this NHTSA permission letter should be attached to the completed HS-7 Declaration Form and submitted to Customs.
3. Keolis complies in full with all requirements of the States of Georgia and Nevada, the Cities of Atlanta and Las Vegas, and any other jurisdiction in which the vehicles are operated.
4. The grant of permission for on-road use provided in this letter applies only to the October 16, 2017 through October 14, 2018 pilot testing program in Las Vegas, Nevada described above. Keolis must notify NHTSA before it operates the vehicles under any conditions other than those specified in this letter. The notification should be submitted to me at the email address provided at the end of this letter, be sent at least three weeks before the new conditions are to take effect, and provide full particulars on those conditions.
5. A label must be affixed to the interior and exterior of each of the vehicles, formatted in a a manner and placed in a location where its contents can be easily read, warning prospective and actual occupants that the vehicle does not comply with all applicable Federal motor vehicle safety standards.
6. If either of the vehicles is involved in a crash or other incident, including near misses and difficult edge cases that the system could not handle without further modification, Keolis notifies NHTSA within 24 hours of the event and provides NHTSA with a full description of the occurrence and, when applicable, with copies of all crash/accident report(s) concerning the occurrence prepared by State or local law enforcement authorities when those reports become available. Notification should be sent to me at the telephone number and e-mail address provided below.
7. Keolis provides NHTSA with documentary proof that the subject vehicles have been exported or destroyed not later than thirty (30) days following the end of the period for which they have been admitted to the United States.
8. Keolis submits an annual report to NHTSA on the status of all vehicles imported for use in the autonomous vehicle research and demonstration program. The first report should be submitted one year after the date of entry for the first vehicle imported for that purpose. Subsequent reports should be submitted on that anniversary date for each year that the vehicles remain in this country. The report should identify, by vehicle identification number (VIN), all vehicles that remain in the United States. The report should identify all vehicles removed from service, the reason(s) for their removal, and their disposition. The reports should be submitted to my attention at the address indicated in the letterhead.

This temporary importation is valid for a period not to exceed one (1) year. If additional time is required, a request for an extension must be submitted in writing, along with a copy of the prior approval letter, no later than thirty (30) business days before the expiration date. It is the importer's responsibility to ensure that all Box 7 approvals are current with NHTSA. Any violation of a term or condition imposed by NHTSA in its letter authorizing importation shall be considered a violation of 49 U.S.C. § 30112(a) for which a civil penalty may be imposed and such a violation will also act to void the authorization and require exportation of the vehicles.

Thank you for your patience and cooperation in furnishing us with the information we needed to take action on your request. If you need any further information, feel free to contact me by telephone at [REDACTED] or by e-mail at [REDACTED].

Sincerely,


[REDACTED]

Coleman R. Sachs, Chief,
Import and Certification Division
Office of Vehicle Safety Compliance