HUSCH BLACKWELL

THOUGHT LEADERSHIP

LEGAL UPDATES

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Autonomous Vehicle Operations: Ongoing Safety Oversight and Compliance Considerations

Recent administrative regulatory action in California highlights the need for ongoing attention to safety oversight and regulatory compliance in autonomous vehicle operations, including procedures for evaluating performance and responding to changing operating conditions.

For autonomous vehicle (AV) companies, an important distinction remains: authorization to operate is a starting point, but it does not mean that the safety and regulatory process is complete and final. Continued deployment requires attention to operating conditions, regulatory expectations, and procedures for responding when circumstances change.

Oversight Can Be Targeted

AV oversight involves federal vehicle-safety responsibilities and state requirements addressing operation, licensing, insurance, and traffic laws. States' operational oversight can include targeted and/or temporary restrictions rather than a complete and final suspension of service. Restrictions may apply to one operating environment while service elsewhere continues.

AV companies should understand the scope of their operating permissions and consider additional voluntary measures related to agency-imposed conditions to prevent more expansive suspensions. That assessment can help identify which services remain available, what adjustments are necessary, and how changes should be communicated to customers and commercial partners without those partners losing confidence.

Operating Boundaries and Documentation Matter

Services

Autonomous Vehicles

Public Policy, Regulatory, & Government Affairs

Technology Commercialization

Truck, Transit, & Ground

Industry

Transportation

Professionals

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Level 4 AV systems perform all driving tasks without requiring human intervention but operate within a defined operational design domain, such as specified routes and operating conditions. Unlike Level 5 automation, they are not designed to operate autonomously on every roadway or under all conditions. Deployment planning should therefore account for both technical capabilities and regulatory authorization, including how changes in road conditions, service areas, or technology affect operations.

For the industry generally, ongoing safety oversight underscores the value of accessible safety documentation, validation records, and coordinated communications between technical teams and regulators. Companies should be prepared to explain their operating boundaries, document responsive measures, and support requests to continue or resume affected services.

How Husch Blackwell Can Help

Husch Blackwell's Transportation team can help AV companies maintain compliance after authorization by reviewing operating permissions and reporting obligations, coordinating responses to agency inquiries, and developing incident-response and record-preservation procedures. We can also assist with regulatory submissions, vendor agreements, data-access provisions, and insurance reviews, while assessing how changes in technology, service areas, or regulatory requirements affect continued operations.

Contact Us

If you want to receive additional information on AV compliance, contact Julie E. Maurer, Jamie H. Steiner, Oluoma Kas-Osoka, Alyssa M. Goehring, or your Husch Blackwell attorney or a member of our Transportation and Supply Chain Logistics team.

This article provides general legal information. It does not constitute legal advice to the reader and does not create an attorney-client relationship between the reader and Husch Blackwell LLP. The reader should seek legal advice if they have questions about how this legal information may apply to their own circumstances.

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