

Date of Hearing: July 2, 2024

ASSEMBLY COMMITTEE ON PRIVACY AND CONSUMER PROTECTION

Rebecca Bauer-Kahan, Chair

SB 1313 (Ashby) – As Amended April 17, 2024

SENATE VOTE: 36-0

SUBJECT: Vehicle equipment: driver monitoring defeat devices

SYNOPSIS

A number of vehicles, including some Teslas, are equipped with automated driving capabilities that allow technology built into the vehicle to control both steering and braking/accelerating simultaneously under some circumstances. The human driver must pay full attention (“monitor the driving environment”) at all times and perform the rest of the driving tasks. Vehicle manufacturers have developed driver monitoring systems for automated vehicles in order to ensure drivers are paying attention to the road. These systems include cameras to monitor a driver’s eyes, weight sensors to ensure a person is in the driver’s seat, and sensors in the wheel to ensure the person is still holding it even though the vehicle is performing the driving tasks.

Drivers are deceiving safety systems through the misuse and abuse of a number of different driver monitoring manipulation devices. According to information provided by the author’s office, “Entire online marketplaces exist dedicated to selling devices, sometimes referred to as ‘nag reduction devices,’ designed to hug the steering wheel and apply pressure to simulate a driver’s hands on the wheel. There are dozens of driver-operated online forums offering guidance on crafting your own ‘homemade’ techniques to deceive safety systems, such as using weighted magnets, water bottles, hair clips, and various other items attached to a steering wheel.”

In 2018, The Verge reported on a device called the “Autopilot Buddy” that was specifically designed and marketed as a “Tesla autopilot nag reduction device.” This device is a piece of magnetic plastic that attaches to a Tesla steering wheel in order to trick the driver monitoring device into thinking the driver’s hands are on the wheel.¹ The National Highway Traffic Safety Administration (NHTSA) issued a cease and desist order to the manufacturer and issued a consumer advisory. A Google search for the “Autopilot Buddy” shows that it remains available for sale, but is now being marketed as a “Tesla cellphone holder” that attaches to the steering wheel.

The purpose of this bill is to prohibit the use of devices that interfere with a vehicle’s direct driver monitoring systems that are part of active driving assistance system (ADAS) technology. The danger associated with drivers using various devices to defeat the driver monitoring features of a vehicle that includes ADAS are clear. Of primary concern for this Committee is whether or not this bill goes beyond simply prohibiting the use of defeat devices while ADAS technology is activated and instead prohibits drivers from doing anything to disable or defeat

¹ Hawkins, Andrew J. “‘Autopilot Buddy’ that tricks Tesla vehicles declared ‘unsafe’ by US,” *The Verge* (Jun. 19, 2018) <https://www.theverge.com/2018/6/19/17479316/tesla-autopilot-buddy-aftermarket-nhtsa>.

driver monitoring and surveillance devices that are engaged when the ADAS technology is not in use. Of particular concern is how this bill impacts in-vehicle cameras.

Given the significant erosion of privacy when people are inside their vehicles, the Committee amendments detailed below would limit the prohibition against using this technology, particularly as it relates to in-vehicle cameras, to those times when the ADAS technology is engaged. This would allow drivers to use devices that cover cameras or other tools that limit the ability of car manufacturers and others to surveil them while they are in their car.

Additionally, the suggested amendments attempt to clarify that the prohibition against manufacturing and selling items that drivers could use to thwart driver monitoring is narrowly defined to only apply to the manufacture of devices specifically designed for that purpose. This makes it clear that other products, like mirrored sunglasses, that can be used as defeat devices but are not manufactured with that use in mind, are not prohibited.

This bill is supported by Tesla and the Alliance for Automotive Innovations (auto manufacturers). Oakland Privacy has taken an “oppose unless amended” position. The bill passed the Transportation Committee on a 15-0 vote.

SUMMARY: Establishes restrictions on devices that are intended to thwart the monitoring of drivers when active driving assistance systems are engaged. Specifically, **this bill:**

- 1) Prohibits vehicles from being equipped with a device that is designed for, or being used for, neutralizing, disabling, or otherwise interfering with a direct driver monitoring system.
- 2) Prohibits a person from using, buying, possessing, manufacturing, selling, or otherwise distributing a device that is designed for neutralizing, disabling, or otherwise interfering with a direct driver monitoring system.
- 3) Provides that a violation of either provision described above is an infraction.
- 4) Exempts the following from the prohibitions described above:
 - a) A person or entity with a valid permit to test autonomous technology;
 - b) A person or entity conducting motor vehicle diagnostic services, repairs, or enhancements consistent with the original equipment manufacturer’s safety standards, whether physically or remotely;
 - c) In connection with an update or enhancement of the driver monitoring system by the original equipment manufacturer;
 - d) In connection with a repair of a vehicle malfunction corrected by the manufacturer or manufacturer-approved third-party; and,
 - e) For modifications or compliance pursuant with the provisions of the federal Americans with Disabilities Act of 1990.
- 5) Defines “direct driver monitoring system” to include, but not be limited to, camera systems, systems that require a driver to maintain their hands on the steering wheel, pressure sensors, safety sensors, distracted driver sensors, systems that help the driver to continue to pay

attention to the traffic situation, and systems that warn the driver when the driver is distracted.

- 6) Provides that the section should not be constructed to restrict or prohibit access to a motor vehicle's onboard computer system to conduct diagnostics, repairs, or enhancements consistent with the original equipment manufacturer's safety standards, whether physically or remotely.

EXISTING LAW:

- 1) Defines "autonomous technology" as technology that has the capability to drive a vehicle without the active physical control or monitoring by a human operator. "Autonomous vehicle" means any vehicle equipped with autonomous technology that has been integrated into that vehicle that meets the definition of Level 3, Level 4, or Level 5 of SAE International's "Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles, standard J3016 (APR2021)," as may be revised. (Veh. Code § 38750 (a).)
- 2) Provides that an autonomous vehicle does not include a vehicle that is equipped with one or more collision avoidance systems, including, but not limited to, electronic blind spot assistance, automated emergency braking systems, park assist, adaptive cruise control, lane keep assist, lane departure warning, traffic jam and queuing assist, or other similar systems that enhance safety or provide driver assistance, but are not capable, collectively or singularly, of driving the vehicle without the active control or monitoring of a human operator. (Veh. Code § 38750 (a).)
- 3) Authorizes an autonomous vehicle to be operated on public roads for testing purposes by specified drivers where certain requirements are met. (Veh. Code § 38750 (b).)
- 4) Prohibits an autonomous vehicle from being operated on public roads until the manufacturer submits an application to the Department of Motor Vehicles (DMV), and that application is approved, as provided. (Veh. Code § 38750 (c).)
- 5) Authorizes law enforcement to issue a corrective ticket for an equipment violation unless there is evidence of fraud or persistent neglect or if the violation presents an immediate safety hazard. (Veh. Code § 40610.)
- 6) Provides that, unless specified otherwise, a person convicted of an infraction under the vehicle code shall be punished with a fine up to \$100 for the first offense, up to \$200 for a second offense, and up to \$250 for a third offense (note: fines are multiplied by other penalty assessments). (Veh. Code § 42001.)

FISCAL EFFECT: As currently in print, this bill is keyed fiscal.

COMMENTS:

1) **Active Driving Assistance Systems.** For decades, companies have increasingly automated various driving tasks under the auspices of increasing driver safety and efficiency. These driving tasks range from acceleration/deceleration (e.g., cruise control) to fully automated driving that requires no driver attention. SAE International, a U.S. based professional association of

engineers, has defined six different levels of automated vehicles (AVs) that include this technology:

- Level 0: The human driver does all the driving.
- Level 1: An advanced driver assistance system (ADAS) on the vehicle can sometimes assist the human driver with either steering or braking/accelerating, but not both simultaneously. An example includes adaptive cruise control.
- Level 2: ADAS on the vehicle control both steering and braking/accelerating simultaneously under some circumstances. The human driver must pay full attention (“monitor the driving environment”) at all times and perform the rest of the driving task. Examples include Tesla’s Autopilot and Cadillac Super Cruise.
- Level 3: An ADAS on the vehicle performs all aspects of the driving task under some circumstances. In those circumstances, the human driver must be ready to take back control at any time when the ADAS requests the human driver to do so. In all other circumstances, the human driver performs the driving task.
- Level 4: ADAS on the vehicle performs all driving tasks and monitors the driving environment – essentially, does all the driving – in certain circumstances. The human need not pay attention in those circumstances.
- Level 5: ADAS on the vehicle does all the driving in all circumstances. The human occupants are passengers and do not need to be involved in driving.²

2) **Reason for the bill.** This bill addresses Level 2 features, which primarily control both steering and braking/acceleration simultaneously, as defined above. Vehicle manufacturers have developed driver-monitoring systems for Level 2 automated vehicles in order to ensure drivers are paying attention to the road. These systems include cameras to monitor a driver’s eyes, weight sensors to ensure a person is in the driver’s seat, and sensors in the wheel to ensure the person is still holding it even though the vehicle is performing the driving tasks.

Drivers are deceiving safety systems through the misuse and abuse of a number of different driver-monitoring manipulation devices. According to information provided by the author’s office, “Entire online marketplaces exist dedicated to selling devices, sometimes referred to as ‘nag reduction devices,’ designed to hug the steering wheel and apply pressure to simulate a driver’s hands on the wheel. There are dozens of driver-operated online forums offering guidance on crafting your own ‘homemade’ techniques to deceive safety systems, such as using weighted magnets, water bottles, hair clips, and various other items attached to a steering wheel.”

In 2018, *The Verge* reported on a device called the “Autopilot Buddy” that was specifically designed and marketed as a “Tesla autopilot nag reduction device.” This device is a piece of magnetic plastic that attaches to a Tesla steering wheel in order to trick the driver-monitoring

² SAE International. *Taxonomy and Definition for Terms Related to Driving Automation Systems for On-Road Motor Vehicles*, (Apr. 30, 2021) https://www.sae.org/standards/content/j3016_202104/.

device into thinking the driver's hands are on the wheel.³ The National Highway Traffic Safety Administration (NHTSA) issued a cease and desist order to the manufacturer and issued a consumer advisory. A Google search for the "Autopilot Buddy" shows that it remains available for sale, but is now being marketed as a "Tesla cellphone holder" that attaches to the steering wheel.⁴

3) **Author's statement.** According to the author:

SB 1313 is a crucial step in ensuring the safety of drivers and pedestrians. This bill prohibits the use of devices that interfere with a vehicle's Active Driving Assistance System (ADAS) technology. ADAS technology offers safety monitoring and driving assistance, which has shown significant potential in reducing traffic collisions, injuries, and fatalities.

However, the overriding of ADAS through manipulation devices undermines the effectiveness of vehicle safety technology, jeopardizing lives in the process. As active driving assistance technology becomes increasingly standard in vehicles, California's traffic laws must adapt to the misuse of technology to keep our roads safe. SB 1313 establishes the necessary measures to preserve the functionality of safety technology and protects our roads from distracted drivers.

4) **Safety concerns.** The Transportation Committee analysis speaks at length about the safety concerns related to ADAS technology:

Experts and some AV developers have questioned whether Level 3 vehicles are safe at all, as it creates a split responsibility between drivers and machines. In October of 2015, Google released a report on its experiences with its driverless technology. In 2012, several Google employees were allowed to use one of Google's vehicles on autonomous mode for the freeway portion of their commute to work. Every employee was warned that the car is in its beginning stage, and they should pay attention 100% of the time. Each car was equipped with a video camera inside that would film the passengers.

Despite Google's instructions, videos showed that some drivers completely turned away from the driving seat to do things like search for a cell-phone charger, while others simply relaxed. Engineers call this behavior automation bias. Google stated in their report: "We saw human nature at work: people trust technology very quickly once they see that it works. As a result, it's difficult for them to dip in and out of the task of driving when they are encouraged to switch off and relax."

Waymo, Google's automated vehicle arm, has publicly stated they will not be releasing level 3 vehicles out of safety concerns that drivers may fall asleep while systems are operating, placing the driver and other users at risk.

Research at Virginia Tech University sponsored by General Motors (GM) and the Federal Highway Administration found similar results. Twelve drivers were given vehicles with adaptive cruise control that handled a car's steering and breaking and put on a test track.

³ Hawkins, Andrew J. "'Autopilot Buddy' that tricks Tesla vehicles declared 'unsafe' by US," *The Verge* (Jun. 19, 2018) <https://www.theverge.com/2018/6/19/17479316/tesla-autopilot-buddy-aftermarket-nhtsa>.

⁴ <https://www.autopilotbuddy.com/>

Drivers were provided reading material, food, drinks and entertainment media. A passenger joined them and was watching a DVD during the test drive. 58% of drivers watched the DVD for some time during the three hour trip. 25% of the drivers read— increasing their risk of a car crash by 3.4 times. Overall, drivers were estimated to be looking away from the road about 33% of the time during the course of the three-hour trip.

While Level 2 systems are not as advanced as Level 3 systems, the problems identified by Google for Level 3 systems for driver overreliance have been prevalent for users of Level 2 systems. Unlike Level 3 systems, Level 2 systems are not capable of completing all dynamic driving tasks, but can complete enough of the dynamic driving tasks where drivers may stop paying attention. Cars with Level 2 technology have several features to deal with this problem. Tesla requires a hand to be on the wheel, while General Motor's Super Cruise has a camera that monitors a human's face to make sure they are paying attention. Tesla's system to ensure drivers are paying attention has not been fool proof. For example, in September of 2021 a Tesla driver was arrested in Glendale, California for driving under the influence. The driver was passed out behind the wheel as the vehicle operating on Autopilot was driving at slow speeds on a freeway overpass. Law enforcement got in front of the vehicle and slowed down to get the vehicle to stop.

5) **Analysis.** The danger associated with drivers using various devices to defeat the driver-monitoring features of a vehicle that includes ADAS are clear. Of primary concern for this Committee is whether this bill goes beyond simply prohibiting the use of defeat devices while ADAS technology is activated and instead prohibits drivers from doing anything to disable or defeat driver-monitoring and surveillance devices that are engaged when the ADAS technology is not in use. Of particular concern is how this bill impacts in-vehicle cameras.

Oakland Privacy, with an opposed unless amended position on the bill, explains it this way:

The evolution of automobiles into “smartphones on wheels” is not good for consumer privacy and has raised a raft of issues. In fact, SB 1313 itself is an outgrowth of the car technology outburst, as what it is regulating is the use of car tech devices to interfere with the operations of other car tech devices. When you get to that point, there is an argument for just stopping the introduction of new car tech devices.

Specifically related to in-vehicle cameras they offer the following:

The term “camera systems” in the definition [contained in this bill] is not precise enough. There are and long have been many kinds of cameras inside of cars, and not all of those systems specifically function to monitor when drivers are distracted. The committee will remember Senator Wieckowski's attempts to enhance privacy protections for in-vehicle cameras which was carried to completion by Senator Dodd in SB 296. Those bills focused on the use of in-vehicle cameras to generate information for advertisers or to provide a back door for law enforcement into private vehicles. We recommend the definition reference camera systems used to gauge whether a driver is focused on the road in front of them, as that is the bill's purpose and concern.

Surveillance technology in new cars. Revelations about Tesla employees inappropriately sharing video recordings of Tesla owners, who were unaware that they were being recorded, speak to the need for regulating the use of in-vehicle cameras. According to the complaint filed in federal court in April 2023:

Since at least 2019, the cameras in Tesla vehicles captured highly-invasive videos and images of the cars' owners, which Tesla employees were able to access—not for the stated purposes of communication, fulfillment of services, and enhancement of Tesla vehicle driving systems—but for the tasteless and tortious entertainment of Tesla employees, and perhaps those outside the company, and the humiliation of those surreptitiously recorded.

By virtue of this defective system, Tesla employees accessed and circulated recordings of Tesla customers in private and embarrassing situations, without their consent including, for example, video of a man approaching a Tesla vehicle completely naked, and video of vehicle crashes and road-rage incidents. Tesla employees also shared pictures of family pets, which were made into memes by embellishing them with captions or commentary before posting them in group chats.⁵

The experience of Tesla owners demonstrates the increasing encroachment of surveillance technology into spaces that people generally consider to be private and illustrates the need for lawmakers to vigilantly protect consumers against that encroachment.

In-vehicle cameras and the reasonable expectation of privacy. In 1967, the United States Supreme Court held that private conversations secluded from the public are protected against government surveillance under the Fourth Amendment's protections against unreasonable search and seizure.⁶ The decision in that case relied heavily on affirming the existence of a reasonable societal expectation that private conversations in areas secluded from the public will be afforded privacy. Since then, the proliferation of so-called "smart" devices and vehicles, with the ability to both actively and passively collect various types of information, have redefined our understanding of this expectation.

The United States and California Supreme Courts have, on several occasions, affirmed that individuals possess a reasonable expectation of privacy inside their vehicles.⁷ This Legislature has also previously recognized the particular need to regulate surveillance in vehicles. In 2003, the Governor signed into law AB 213 (Leslie; Ch. 427, Stats. 2003), which required motor vehicle manufacturers to disclose in the vehicle's owner's manual if a vehicle sold or leased in this state is equipped with one or more "event data recorders (EDRs)" or "sensing and diagnostic modules (SDMs)," recording devices that collect certain telematics from the operation of the vehicle. AB 213 also prohibited any person other than the owner of a vehicle from downloading or otherwise retrieving EDR or SDM data, except with the consent of the owner or under specified circumstances.

AB 213 responded to the growing number of vehicle manufacturers "installing recording devices in vehicles that may perform a variety of functions, from recording and transmitting accident data to recording a history of where the vehicle travels," and provides that a manufacturer of a new motor vehicle sold or leased in this state may not download or otherwise retrieve any of the

⁵ *Yeh v. Tesla, inc.*, No. 3:23-cv-01704 Class Action Complaint (2023)

<https://storage.courtlistener.com/recap/gov.uscourts.cand.410887/gov.uscourts.cand.410887.1.0.pdf>

⁶ *Katz v. United States* (1967) 389 U.S. 347.

⁷ See, e.g., *United States v. Jones* (2012) 565 U.S. 400; *People v. Xinos* (2011) 192 Cal. App. 4th 637; *People v. Bell* (1996) 43. Cal. App. 4th 754.

following data except under specified circumstances: recordings of how fast and in which direction the motor vehicle is traveling; recordings containing a history of where the motor vehicle travels; recordings of steering performance; recordings of brake performance, including, but not limited to, whether brakes were applied before an accident; recordings of the driver's seatbelt status; and information concerning an accident in which the motor vehicle has been involved.

In-vehicle cameras can serve a variety of functions, ranging from using facial-recognition technology to automatically adjusting seat and mirror settings for each driver, to detecting drowsy or distracted drivers and either alerting them or capping vehicle speed. In the United States, all new cars are required to have backup cameras to help drivers avoid accidents, and other countries have already expanded such safety requirements to include in-vehicle, driver-directed sensors and cameras. However, little is known about how data collected by these cameras is stored and used, and with most new cars sold in the United States, including all new Fords, GMs, and BMWs, and nearly all Toyotas and Volkswagens, coming with built-in internet connections, the possibility that such private data is being made immediately accessible to automobile manufacturers and others without the knowledge or consent of the driver arguably warrants specific protections and consideration when considering bills that involve interior and exterior cameras.

Given the significant erosion of privacy when people are inside their vehicles, the Committee amendments detailed below would limit the prohibition against using this technology, particularly as it relates to in-vehicle cameras, to those times when the ADAS technology is engaged. This would allow drivers to use devices that cover cameras or other tools that limit the ability of car manufacturers and others to surveil them while they are in their car.

Going forward, the author may wish to consider the option put forward by Oakland Privacy that would further narrow the definition of direct driver-monitoring systems (DDMS) to technology that is on a closed loop and is not transmitted outside of the car. They explain the reason for the amendment this way:

Privacy-respecting DDMS systems should operate a closed loop, in the sense that they provide direct feedback to the driver of the car, but do not otherwise exchange information with any third parties, including the car manufacturer, law enforcement, insurance companies or advertisers. The bill should restrict itself to these closed loop systems as other kinds of car technology should not prevent drivers from choosing not to use them if they prefer.

Additionally, the suggested amendments attempt to clarify that the prohibition against manufacturing and selling items that drivers could use to thwart driver monitoring, is narrowly defined to only apply to the manufacture of devices specifically designed for that purpose. Therefore, making it clear that other products, like mirrored sunglasses, that can be used as defeat devices but are not manufactured with that use in mind, are not prohibited.

6) Suggested Committee amendments. The Committee is suggesting the following amendments in order to balance protecting the privacy of drivers with the important safety measures contained in this bill.

Amendment #1 is intended to clarify what constitutes a prohibited device:

28155. (a) A vehicle shall not be equipped with a device that is *specifically* designed *for, marketed* for, or being used for, neutralizing, disabling, or otherwise interfering with a direct driver monitoring system *that is engaged when drivers are utilizing active driving assistance system technology*.

(b) A person shall not use, buy, possess, manufacture, sell, *advertise for sale* or otherwise distribute a device that is *specifically* designed for neutralizing, disabling, or otherwise interfering with a direct driver monitoring system *that is engaged when drivers are utilizing active driving assistance system technology*.

Amendment #2 removes an unnecessary “notwithstanding” clause:

(d) ~~Notwithstanding any other law,~~ *All* of the following are exempt from subdivision (a) or (b):

Amendment #3 updates the definitions in the bill:

(e) *For purposes of this section, “active driving assistance system” means Level 2, Level 3, Level 4, or Level 5 of SAE International’s Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles, standard J3016 (APR2021).*

(f) For purposes of this section, a “direct driver monitoring system” includes, ~~but is not limited to,~~ *exterior camera systems, interior camera systems designed specifically to monitor the alertness of the driver while active driving assistance system technology is engaged,* systems that require a driver to maintain their hands on the steering wheel, pressure sensors, safety sensors, distracted driver sensors, systems that help the driver to continue to pay attention to the traffic situation, ~~and~~ *systems that warn the driver when the driver is distracted, and any other system that has been shown to be effective in monitoring drivers while they are utilizing active driving assistance system technology.*

Amendment #4 adds an exemption, particularly related to the cameras, for situations where, for safety reasons, it may be necessary for a driver to disable a driver monitoring device:

(g) This section shall not be construed to:

(1) *Restrict or prohibit access to a motor vehicle’s onboard computer systems to conduct diagnostics, repairs, or enhancements consistent with the original equipment manufacturer’s safety standards, whether physically or remotely; or*

(2) *Prevent a person from taking immediate steps to protect the life or physical safety of the driver or other people in the vehicle.*

7) **Related legislation.** SB 296 (Dodd; Ch. 864, Stats. 2023) requires the disclosure of in-vehicle cameras installed by the manufacturer and places restrictions on what can be done with video recordings from such cameras and where such recordings can be retained.

SB 1398 (Gonzalez; Ch.308, Stats. of 2022) requires a dealer or manufacturer of a passenger vehicle that is equipped with any partial driving automation feature to provide the buyer or owner with a notice that provides the name of each feature and clearly describe the functions and limitations of the feature.

ARGUMENTS IN SUPPORT:

Writing in support of the bill, the Alliance for Automotive Innovation notes:

All vehicles with active driving assistance systems (ADAS) require continuous driving supervision in all driving environments. ADAS includes features like adaptive cruise control, lane keeping assistance, and automatic emergency braking. Additionally, many vehicles are also equipped with driving monitoring systems (DMS), designed to prevent accidents. DMS features detect driver impairment and enable appropriate interventions. These systems include cameras to monitor the driver's eyes, head position, and sensors to detect that hands are kept on the steering wheel.

Unfortunately, some drivers attempt to deceive or override these safety systems by using devices designed to mimic actual hands-on steering wheel action. Dedicated online marketplaces exist purely to sell devices designed to hug the steering wheel and apply pressure to simulate a driver's hands on the wheel. Additionally, there are online forums offering guidance on crafting your own "handmade" techniques to deceive safety systems that attach to a steering wheel.

Vehicles equipped with ADAS are not designed to operate independently of the human driver. There is nothing currently in California law that allows law enforcement to stop or cite a driver who has tampered with a vehicle's safety features, thus allowing them to drive hands-free or otherwise disengage from driving. This results in dangerous inattentiveness and eliminates a vehicle's safety capabilities, thus endangering pedestrians and motorists.

The law is behind on regulating these devices and there are no laws in the state that prohibit their sale or circulation. Though there have been efforts from the National Highway Traffic Safety Administration (NHTSA) to end the marketing, sale, and distribution of these devices, online retailers continue to sell and offer them, promoting a dangerous product whose use will ultimately end in needless and preventable traffic accidents, injuries, and fatalities.

ARGUMENTS IN OPPOSITION: See Comment #5.

REGISTERED SUPPORT / OPPOSITION:

Support

Alliance for Automotive Innovation
Tesla

Oppose Unless Amended

Oakland Privacy

Analysis Prepared by: Julie Salley / P. & C.P. / (916) 319-2200