



November 14, 2024

Ministry of Transportation of Ontario  
Ontario, Canada

**Re: The Proposed framework for an Automated Commercial Motor Vehicle (ACMV) Pilot Program**

The Canadian Automated Vehicle Initiative (CAVI) is pleased to submit to the Ministry of Transportation of Ontario (MTO) the following comments on the *Proposed Framework for an Automated Commercial Motor Vehicle (ACMV) Pilot Program*.

CAVI's response is mixed. On the one hand, CAVI congratulates and supports MTO on this initiative. MTO is certainly the leading Provincial / Territorial jurisdiction with its activities moving us towards the era of Connected and Automated Vehicles (CAVs).

On the other hand, CAVI is aware that Canada lags some other countries in planning for the deployment of CAVs, and we encourage MTO to do more and to do it faster. For example:

- We encourage MTO to develop and pass a *CAV Bill* through the Ontario Legislature. This would be based on the world-first AV Bill passed by the UK Government, although it would have to be adapted for the Canadian and Ontario realities.
- Trucking operations are conducted across Canada. We encourage MTO to develop agreements with other jurisdictions to support trans-Canada ACMV pilots. This is very feasible within the 10-year duration of this pilot program.
- The focus of the ACMV is larger trucks. We encourage MTO to include commercial bus pilots – larger than the shuttles that have already been demonstrated. As you probably know, there are active automated bus projects in Scotland and England, and multiple projects in the US<sup>1</sup>. And yet MTO's position seems to be that "it cannot happen here". To be frank, I was disappointed to hear that. The suppliers for the Cambridge, UK automated bus project include Alexander Dennis, which is owned by NFI in Winnipeg. The bottom line is that NFI is a stakeholder in a UK automated bus project and

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<sup>1</sup> <https://www.transit.dot.gov/research-innovation/fta-managed-transit-bus-automation-demonstration-projects>

Ontario appears to be saying "you cannot replicate that project here". We respectfully submit that MTO expands the ACMV program to include larger automated buses.

A more detailed comment is the requirement for a sign at the front and back of trucks that says: "TEST VEHICLE. STAY BACK". As I have mentioned previously, there is a tendency for human drivers to engage in dangerous behaviour if they know that a vehicle is being driven by a computer. We recommend that this requirement be removed.

Thank you for this opportunity to comment. If any follow-up is required, please contact the undersigned.

Best regards

A handwritten signature in black ink, appearing to read "Barrie Kirk". The signature is fluid and cursive, with the first name being more prominent.

Barrie Kirk  
President, CAVI