

CANADIAN EDITION

Insuring Autonomy:

How auto insurance will lead through changing risks

OCTOBER 2021



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EXECUTIVE SUMMARY

The evolution of autonomous vehicle – or “AV” – technology continues at a rapid pace across North America, bringing several significant policy questions and challenges to light. It will be important to address a transportation system that includes AVs in a comprehensive manner and in a way that spurs innovation, increases public safety, provides peace of mind, and protects Canadian drivers and consumers. Travelers believes that the auto insurance industry should – and will – play a critical role, as lawmakers, regulators and society adapt to the newest mode of transportation. This position paper outlines Travelers’ perspective and recommendations on these important public policy issues.

■ Overview: The autonomous vehicle (AV) world today and tomorrow.

- It is important to address public policy questions and challenges in a comprehensive manner that increases public safety, provides peace of mind, protects drivers and pedestrians, and spurs innovation.
- Travelers believes that the auto insurance industry should – and will – play a critical role, as lawmakers, regulators and society adapt to the newest mode of transportation.
- Travelers supports all measures that help ensure the safety of our roadways, and the company believes AVs ultimately will benefit society by reducing the number of crashes, injuries and lives lost.
- There continue to be many unknowns associated with AVs. For example, how long will it take to transition to a fully autonomous fleet? How long will it take for the anticipated benefits of AVs to be realized? What unintended consequences and disruptions will arise during the transition?

■ Auto insurance can – and will – meet society’s needs in an AV world.

- Travelers believes that leveraging the existing automobile insurance structure, both commercial and personal, is the best method for compensating crash victims quickly and efficiently – now and in the future.
- The current insurance structure is already designed to adapt to evolving risk environments and would minimize regulatory uncertainty, market disruptions and consumer confusion.
- Continuing to rely on auto insurance for coverage, regardless of vehicle type, will also help to ensure consistency during the period in which AVs and driver-operated vehicles share the road.
- Whether a vehicle is autonomous or driver operated, auto insurance offers vehicle owners the most peace of mind when it comes to other concerns such as weather damage or theft.

■ Critical insurance-related components for AV regulation.

- Any proposed legal and regulatory framework governing AVs must include provisions specifically related to auto insurance.
- Vehicle owners should be required to purchase and maintain adequate insurance for their AV, whether it is a personal, ride-hailing or company-owned vehicle.
- The insurance industry should play a central role in AV policy-making and stakeholder discussions. Lawmakers and regulators must coordinate and seek input from all relevant constituents to ensure a consistent, rational regulatory framework that addresses all potential issues.
- Travelers would support the development of a model law relating to AV insurance that builds on the current regulatory and oversight structure for auto insurance.
- Travelers engages with coalitions that help educate the public and make recommendations on AV-related issues. Insurers also have extensive consumer communication programs and can help educate key groups on AV safety.
- Travelers is a member of the Insurance Bureau of Canada (IBC) autonomous vehicle committee and will continue to proactively provide input and thought leadership to all stakeholders.

As a longtime leader and innovator in both commercial and personal auto insurance, Travelers is well positioned to contribute to this discussion, committed to being a part of the insurance solution for these risks and actively underwriting for risks in the commercial market. We are pleased to outline the company’s position here and look forward to continuing important dialogue across sectors in the years to come.

To learn more, visit travelersinstitute.org.

OVERVIEW:

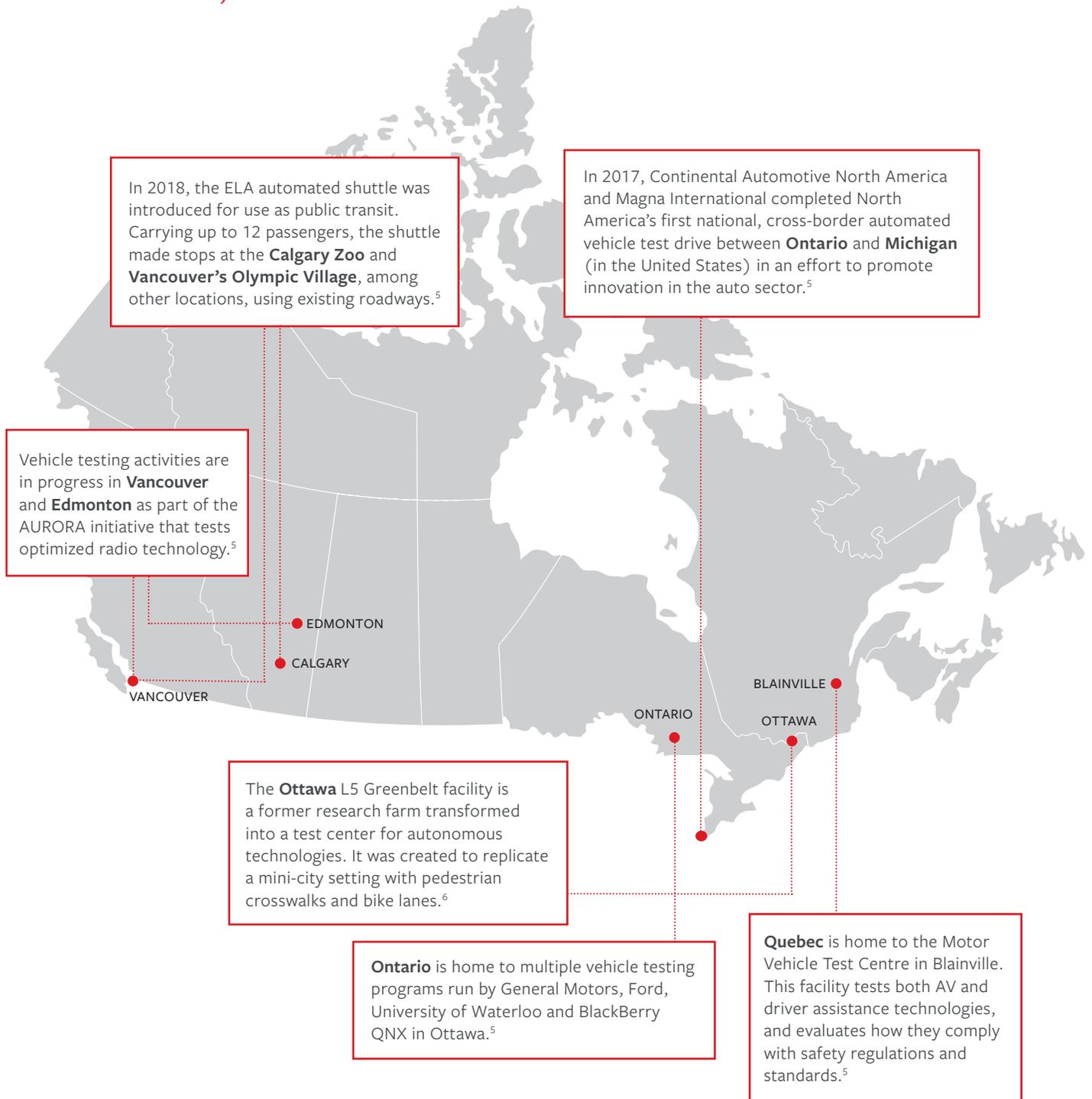
THE AUTONOMOUS VEHICLE (AV) WORLD TODAY AND TOMORROW

The growth of the AV industry has accelerated significantly over the last several years and continues to rapidly expand. In 2016, Ontario announced a 10-year pilot program to allow AV testing in the province.¹ The Ontario government is providing financial support for emerging and established AV technology businesses through the Autonomous Vehicle Innovation Network (AVIN).² Ontario is also actively promoting the province as an investment opportunity for AV companies and recently led a virtual auto-tech trade mission with 18 companies from Silicon Valley.³ Other provinces have also passed legislation to permit vehicle testing, with multiple provincial test initiatives in flight for personal, commercial and public transportation vehicles. AV technology companies are launching in Canada to develop products and test new technologies. As a result, Canada is well positioned for a future with widespread AV deployment. While this position paper focuses on AVs and the insurance system in Canada, it is important to recognize that countries around the world are also making significant progress in autonomous technologies.

However, progress does come with its challenges. Consumer sentiment, regulatory considerations and infrastructure support present challenges to AV adoption and deployment.

In addition, the effects of the COVID-19 pandemic on the transportation industry have been far-reaching as province-wide shutdowns and an increase in remote work kept drivers off Canadian roadways. In Ontario, for example, collisions decreased 26 per cent in 2020 over 2019. While crash frequency dropped, risky driving patterns emerged. Ontario's traffic fatality rate rose 22 per cent in 2020 when compared to 2019, according to data from the Ontario Provincial Police.⁴ Similar trends were seen across other provinces and in the United States. While the ultimate effects of the COVID-19 pandemic still remain largely unknown, it had a profound impact on automotive transportation in 2020. Moreover, AVs have the potential to provide transportation in a manner that mitigates exposures arising out of future pandemics.

Cities across multiple Canadian provinces continue to embrace the AV wave and many have been identified as hot spots for this technology due to their favourable regulatory environment, heavy tech presence and, in some cases, weather.



Not surprisingly, the AV industry continues to attract significant investment from traditional auto manufacturers and technology companies.

The AV landscape has evolved rapidly, with the technology progressing as more and more companies have entered the industry. Today, nearly every major auto manufacturer takes part in the AV ecosystem in some fashion, but it does not stop there. Countless startups and tech giants are also dedicating resources to this industry.

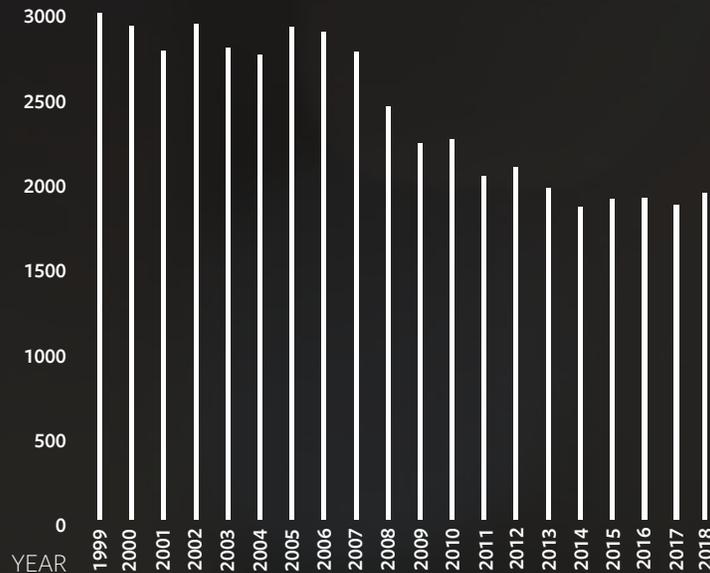
AV research and development appears to be full steam ahead. However, one of the largest barriers is consumer readiness to embrace AV technology. In a 2020 survey conducted by Partners for Automated Vehicle Education, of which the Travelers Institute is a member, nearly three-quarters of respondents stated they believe “AV technology is not ready for prime time,” with 20 per cent of respondents saying they believe AVs will never be safe.⁷ While the promise of safer roads and more leisurely drives appeal to some, the difficulty of producing and deploying AV technology still looms in the present.

Development of AVs is still at an early stage with most vehicles still in testing. There have been some instances of collisions, including a 2018 Tesla Model X crash in Mountain View, California, and a 2018 Uber crash involving an autonomous test vehicle in Tempe, Arizona. Both crashes resulted in fatalities, and in each instance the autonomous system was found partially at fault.

In the case of the Uber crash, which killed a pedestrian crossing the street, it was deemed that the vehicle programming did not include consideration for jaywalking pedestrians, and therefore, did not recognize the pedestrian in its path soon enough to engage emergency braking.⁸ How systems handle scenarios like this will be a subject for important discussion as AV adoption becomes more widespread.

With 94 per cent of crashes attributed to driver error as the final, critical reason for the crash,⁹ an obvious goal is for AVs to increase roadway safety. However, lower levels of automation that rely partially on automated systems and partially on a human driver can present risks related to misuse, including driver distraction and lack of attention on the road. Driver monitoring systems and driver attention reminder methods may be key factors in maintaining safety during this transition.¹⁰

TOTAL CANADIAN MOTOR VEHICLE TRAFFIC FATALITIES



There were 1,922 fatalities and more than 150,000 injuries on Canadian roads in 2018, according to Transport Canada.¹¹

TRENDS TO WATCH

Distracted driving related to technology may be one of many factors contributing to collisions and fatalities. This issue may take on more relevance in the near term as new semi-autonomous technologies requiring driver interventions are rolled out to the public.

The insurance industry may see collision rates decline as AV adoption rises. However, while the industry had been experiencing some level of favourable frequency over the last few years, particularly due to the COVID-19 pandemic, early predictions of dramatic reductions have not materialized as of mid-2021.



Although some experts predict that market saturation for fully autonomous vehicles may not occur for a few more decades, the market is clearly moving in that direction, and policy and regulatory regimes (along with industries like insurance) must adapt now.

Policy-makers and regulators across all levels of government in Canada are getting involved in the development and rollout of AVs.

- **Federal government:** The federal government has been actively involved in the development of guidelines for vehicle safety, testing and cybersecurity. It also has oversight of vehicle safety through Transport Canada, which has released a series of guidelines including “Canada’s Safety Framework for Automated and Connected Vehicles” in September 2018, and “Canada’s Vehicle Cyber Security Guidance” in June 2020.¹² In January 2018, a Federal Senate Committee also released a report on AVs called “Driving Change: Technology and the future of automated vehicles.”¹³
- **Provincial governments:** Provinces oversee testing, vehicle operation and safety, and insurance. Some provincial governments, for example, have issued legislation permitting vehicle testing, outlining where that testing can be done and requirements on driver oversight to ensure public safety.
- **Municipal governments:** Municipalities have also started to recognize the need for infrastructure change. In March 2021, a panel of experts from the Council of Canadian Academies published “Choosing Canada’s Automotive Future: The Expert Panel on Connected and Autonomous Vehicles and Shared Mobility,” which emphasized the importance of urban planning for municipalities.¹⁴

Discussions have also started among national and provincial regulators on how best to establish an insurance framework. In February 2021, the Canadian Council of Insurance Regulators issued “Connected and Automated Vehicles and their Impact on the Automobile Insurance Market.”¹⁵

The scope of activities underscores the range of change required for the future transformative shift in transportation. For the reasons we will discuss on the following pages, any proposed regulatory structure should explicitly address insurance-specific issues and needs in the new AV landscape, which will be vital to ensuring a fair and efficient scheme for no-fault benefits and compensation.

AUTO INSURANCE CAN – AND WILL – MEET **SOCIETY’S NEEDS IN AN AV WORLD**

Auto insurance compensates victims quickly, fairly and efficiently, especially when compared to other risk transfer mechanisms.

Leveraging the current auto insurance structure as the primary risk transfer mechanism in a new AV world allows for greater speed, fairness and efficiency from a consumer’s perspective. The existing insurance structure is designed to quickly make vehicle owners whole and efficiently compensate crash victims for both bodily injury and property damage. Policyholders would continue to have full access to Accident Benefits coverage, which provides drivers and passengers with prompt payment for medical expenses, lost income and other first-party coverages. Insurance companies would also continue to provide coverage for any necessary vehicle repairs. In addition, most vehicle owners are familiar and comfortable with the existing insurance structure (e.g., purchasing coverage, having a basic understanding of coverage and policy documents, filing claims) and know how to take advantage of its benefits.



Moreover, the existing auto insurance structure can adapt more effectively than alternative structures to the evolving regulatory and legal environment by creating or enhancing insurance products. Given auto insurers' deep understanding of compensation systems, they are uniquely positioned to assist policy-makers in developing or modifying such systems for no-fault benefits and timely compensation.

While there has not been widespread attention paid to how liability and compensation will be addressed as AVs multiply, product liability has been raised as the inevitable default option. That presumption should be challenged.

Unlike auto insurance, alternative risk transfer mechanisms, such as product liability, are not structured to be primary, comprehensive solutions. In a recent study, the RAND Corporation found that a critical component of an insurance framework for AVs is how effectively it will compensate the victims of collisions.¹⁶ A product liability-type regime for AVs that is in lieu of, or with primacy over, the current auto insurance structure, could force consumers and victims to pursue complex, lengthy lawsuits to seek compensation. Such suits involve intensive and drawn-out investigative and evidentiary hurdles before anyone sees a day in court.

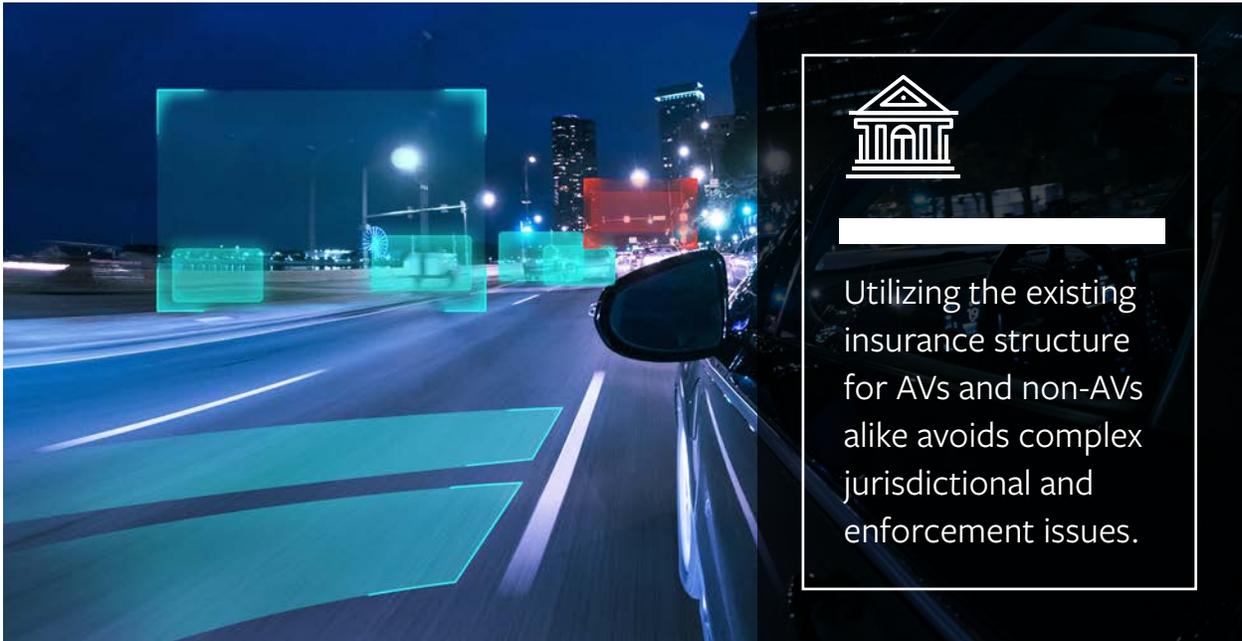
Further, the product liability legal and regulatory environment is ill-suited for handling auto collisions, as the sheer number of discrete incidents would bog down court systems and significantly delay compensation. Victim compensation, if it happens at all, could take years. The RAND Corporation report also states that the large number of automobile crashes that occur today requires "a vast infrastructure of specialists who resolve, adjudicate and repair these claims," and that insurance companies have built teams of experts who specialize in doing just that.¹⁷

The Takata air bag case is an example of the limitations of product liability in compensating victims. It has taken well over a decade for this case to proceed through the report filing, regulatory investigation, recall and compensation phases of the product defect regime that governs automakers and equipment manufacturers. Some auto companies have settled with consumers, but others are still embroiled in litigation. This is a particularly striking fact given that the initial product problems and driver injuries occurred in 2004.

Notably, and not surprisingly, the primary risk transfer and compensation mechanism for even more sophisticated modes of transportation (e.g., trains, airplanes, boats) goes beyond product liability and is based upon insurance. For consumers, businesses and regulators, it makes sense that AVs will follow suit.

Using existing auto insurance systems minimizes consumer confusion, regulatory uncertainty and market disruptions.

Fundamentally, there is a high level of certainty and stability for consumers, businesses, regulators and legal systems in the current auto insurance structure. Generally all vehicles and drivers are covered with some liability protection. Auto insurance has a robust legal and regulatory infrastructure with proper, comprehensive consumer protections in place to govern insurance providers and policyholders.



Additionally, auto insurance distribution systems are already in place and will evolve to accommodate new technologies and risks. Pricing and underwriting will likely shift to include both driver- and vehicle-based systems. This will allow insurers to play their traditional role in risk mitigation by sending pricing signals vis-a-vis premium differentiation among covered autos to encourage AV technological improvements. In a December 2020 report published by the RAND Corporation, one auto manufacturer is quoted as saying there is “no reason that the current system cannot keep working.” Other experts weighed in, stating that historically the auto insurance industry has remained resilient in the face of technological improvements and innovation.¹⁸ Given the technology and data capture that is occurring in real time, insurance policies addressing data sharing may be implemented to help ensure that premiums are appropriately matched to exposures. Insurance companies like Travelers have the sophistication to do this. Further, AVs may present new risks and liabilities (e.g., cybersecurity threats) that may need to be addressed by a new generation of insurance products and coverages.



During the period in which AVs and non-AVs will likely be sharing the road, auto insurance systems must, and will, be able to accommodate and adequately address both types of vehicles. During this transition, a thoughtful compensation system is needed to prevent consumers from becoming mired in lengthy and expensive legal and technical disputes about whether human error or technological malfunction caused a collision. Significantly, the lack of a timely and efficient compensation system could also hinder the more widespread adoption of AVs. Consistency in delivery, customer experience and expectations, with clear “rules of the road” (e.g., regulatory oversight, legal requirements, etc.), are vital to a rational risk transfer regime. If AVs and other vehicles are governed by different primary insurance structures, the resulting consumer confusion and regulatory uncertainty may increase expenses associated with contentious liability determinations and market disruptions. Dividing the market in such a way would create a veritable patchwork on the roadways with respect to who is covered, for what, and under which regulatory and legal framework.

Moreover, if separate compensation and liability structures govern and/or have primacy over different types of vehicles and their owners, questions and uncertainty may arise around issues such as appropriate forum, liability and evidentiary standards, and the application of various no-fault-type systems.



Subrogation is already an important element of the auto insurance system.

Today, insurers compensate crash victims for personal injuries and property damage and then, if appropriate, seek to recover those payments from vehicle manufacturers if some defect caused the loss. This process is called subrogation. Several years ago, Toyota faced numerous “sudden acceleration” cases, which were alleged to have been caused by product defects. As there were both property damage and bodily injury claims associated with these Toyota vehicles, auto insurers paid the claims even if there was evidence that the crash might have been caused by a sudden acceleration defect. Subsequent to paying the claims, some of the insurers filed subrogation actions against Toyota.¹⁹ This is an important element of the auto insurance system and should continue going forward: The claimants are promptly compensated by the insurer, and the individual insurer then assumes the burden (and has the resources) to pursue the product manufacturer to recover those losses.

These product liability claims can be complex and expensive. Potential product liability claims involving AVs could involve additional complexity and related cost. A system that prioritizes no-fault benefits and compensation over resolving whether an AV was defective provides the most consistency and certainty to consumers, and leverages the existing legal and regulatory frameworks that have routinely adapted to technological advances. Avoidance of these subrogation actions also creates an incentive for AV manufacturers to design and build safer vehicles, which is a key benefit of this system.

Insuring AV risks in the commercial insurance sector today.

Travelers prides itself on the investments it makes to better understand emerging risks and provide marketplace solutions for its insureds. Building partnerships with companies in the AV industry is an excellent example of this. There is a growing market in the commercial insurance sector for AV risks among technology developers, operators, support services, etc., and Travelers is committed to being a part of the insurance solution for these risks.

Travelers is actively engaged and continues to look for opportunities that fit our risk profile. Through extensive research, engagement with experts, industry-related partnerships and thoughtful underwriting, Travelers believes these risks present opportunities for insurers. For progress to continue, it is imperative that insurance markets have solutions for these emerging risks.



In the United States, actively partnering with companies in the AV market today has proven to be mutually beneficial for both Travelers and the companies we insure. Insureds benefit from Travelers' risk management and mitigation strategies, developed during our more than 165 years in business, and we continue to refine our underwriting expertise as we further engage in the AV industry. Furthermore, Travelers' state-of-the-art Risk Control team could assist these niche companies by examining and offering recommendations to help them mitigate their risk exposure. The learnings from the United States operations will be critical as Travelers looks for these opportunities in the Canadian market. As the AV industry continues to mature, Travelers is committed to being an active partner and helping to pave the path forward.

■ Auto insurance will have an important role to play in an AV world.

AV owners will still need coverage for non-collision-related incidents such as weather and theft.

Even with fully autonomous vehicles, human involvement will not disappear, and individuals will still need auto insurance. For the foreseeable future, vehicles with some driver involvement will continue to face issues around liability for crashes. As increasingly distracting technologies are deployed in partially automated vehicles, liability insurance may become even more important.

Also, vehicle maintenance by owners (e.g., getting tires and brakes fixed, installing technology/software updates, sensor maintenance) can result in personal responsibility and liability, which is properly addressed through insurance. Further, AV owners will still need coverage for non-collision-related incidents such as theft and weather damage. Product liability simply does not cover the entirety of essential coverage areas related to vehicle operation and ownership.

Finally, AV owners – like all other vehicle owners – want peace of mind that they are protected against the costs of unforeseen events. Auto insurance provides consumers with 24/7 protection, unlike other risk transfer systems that are dependent upon specific legal criteria and/or circumstances (e.g., a provable mechanical or design product malfunction/defect).

CRITICAL INSURANCE-RELATED COMPONENTS FOR AV REGULATION

Any comprehensive AV legal/regulatory structure must include insurance-specific policies.

Travelers recommends the following to address pressing insurance-related issues associated with AVs:

Specifically address insurance liability standard as the primary risk transfer mechanism.

Today, there are several risk transfer and liability schemes governing and impacting the auto market. These include insurance, common law negligence, various no-fault and personal injury protections, statutory systems, product liability, fraud laws and licensing requirements. While Travelers anticipates that this will be the case in an AV world as well, the company believes that auto insurance should play the same primary risk transfer role in that world as it does now for non-AVs.

Notably, legal systems are already considering how to address novel compensation issues surrounding AV collisions. For example, in the United States, the National Transportation Safety Board determined in its review of a fatal crash involving a Tesla vehicle that use of the Tesla autopilot feature contributed to the crash, along with the two drivers involved.²⁰ The decision demonstrates the ability of existing legal systems to evaluate the complex and varied risks presented by AVs.



The insurance industry will adapt to this increased complexity, and Travelers is ready to lend its expertise to regulators and legislators who are working through these changes.

Thus, any public policy proposals regarding governance of AV liability should specifically address compensation systems and insurance liability standards, including who is responsible for obtaining coverage. As with the current auto insurance system, AV owners should be responsible for obtaining and maintaining adequate insurance. This should apply whether the vehicle is for personal, ride-hailing or company use.

Because there may be many possible approaches to liability and compensation for AVs, including systems that may not exist today, a framework is needed to evaluate various options. An AV liability system should be evaluated on its ability to achieve the best balance of the following three objectives:

- **Provide full and timely compensation for victims** – Injured parties should be made whole without delay through no-fault benefits and compensation processes.
- **Efficient claim resolution** – Minimize expensive and protracted liability determinations for most crashes.
- **Encourage adoption of AVs and increased safety of AVs** – A liability system should encourage the AV industry to achieve safer outcomes. Insurers have encouraged safer vehicles for decades through risk pricing, safety research conducted by Transport Canada, the Insurance Institute for Highway Safety and other efforts.

■ Standardize data governance and cybersecurity requirements.

AVs present new questions and opportunities with respect to data collection and management, which have only been heightened by recent developments related to social media data and privacy. While Travelers is agnostic with respect to who develops and imposes data management requirements, the company supports standardization (via legislation or regulation, for instance) of data collection, sharing, storage and security requirements.

To facilitate an effective and efficient AV auto insurance system, the government should require timely data sharing (by auto manufacturers and others who obtain data on crashes and AV performance) with insurance providers, while ensuring adequate protections for consumer privacy. Sharing data with insurers has the potential to help facilitate insurance coverage in several ways, including:

- Establishing liability/causation in the event of a crash (a function performed by the insurance carrier, not the customer).
- Assisting with accurate underwriting and pricing of insurance policies.
- Supporting risk mitigation and control activities (e.g., via software updates).

Ultimately, standardization of data governance and assurance of data sharing with insurers benefit all parties involved, including vehicle owners, collision victims, manufacturers and insurance providers.

Further, Travelers supports the creation of an expert advisory board or committee to help address data and cybersecurity issues, including how these issues are related and how they can effectively be addressed together. Insurer representation on any such body would be essential.





Travelers supports developing strong cybersecurity requirements for AVs – an issue that is intertwined with the creation of data management standards. Cyber-related risks impact the safety of our communities in an AV world, and thus must be addressed. This also highlights the need for appropriate data sharing protocols. If a cyber incident occurs, it will be important to have the data explaining what happened, not only for insurance-related purposes, but also for future risk mitigation and preventive efforts.

Ensure representation of the insurance industry in policy-making and stakeholder forums.

Travelers supports using advisory boards and task forces comprising private and public sector experts to help inform AV policy-making processes and content, and we encourage public policies that ensure the insurance industry has a seat at the table. Many stakeholder groups beyond insurers will have an interest in the development and implementation of new AV policies, including consumer groups, manufacturers, technology developers and suppliers, attorneys, regulators, legislators, public policy academics/researchers and countless others. Travelers has already joined a number of these cross-sector coalitions in the United States, including Partners for Automated Vehicle Education and MIT's Advanced Vehicle Technology Consortium. In the United States, Travelers is also hosting educational programming to advance consumer education and industry dialogue about AVs through its public policy division, the Travelers Institute. Travelers plans a similar approach in Canada and will actively work with stakeholders to develop insurance solutions that support the safe development of AVs.

Insurers will have unique and valuable insights into several key issues that will likely arise from AV technology, such as risk assessment and mitigation, big data analysis, the functioning of comprehensive liability regimes and navigating provincial-federal coordination issues. As a longtime industry leader and innovator in both commercial and personal insurance, Travelers is well positioned to contribute to these policy-making discussions. Additionally, Travelers supports and would be willing to lead the creation of a non-government stakeholder coalition to address and make recommendations with respect to insurance-related AV issues.

Promote communication and coordination between policy-makers and other stakeholders.

Many lawmakers and regulators at the municipal, provincial and federal levels are grappling with the policy challenges and opportunities related to the AV world, as are private industry groups and individual companies. Coordination among these players is essential to develop a coherent and rational regulatory structure that will promote growth and adoption of AV technology, as well as public safety, during the transition to AVs.

One important step is public-private co-operation via standing advisory boards or similar structures. Such bodies generally promote consensus building and creation of best practices, while also recognizing the need for flexibility to promote consumer-driven, private-market competition and innovation.



At the policy-maker level, Travelers encourages municipal, provincial and federal officials to work together to the greatest extent possible. The current province-based regulatory and oversight structure for insurance is well established and provides certainty for businesses and consumers. To build upon this existing structure and promote uniformity between AV-related insurance approaches – both during the AV transition/testing phase and after fully autonomous vehicles are publicly available – Travelers would support development of a model law, as well as collaboration between Transport Canada and provincial regulators.

Finally, Travelers encourages all policy-makers to communicate openly and regularly with the public as policy discussions are conducted and decisions are made. Transparency in the process will encourage public trust with respect to evolving AV technology and related safety measures.

Utilize existing insurer delivery systems to communicate with consumers.

As noted, AVs will likely require some level of human involvement for the foreseeable future. Accordingly, there may be opportunities to increase safety by educating drivers about the evolving technology and their roles and responsibilities with respect to driving functions. To the extent that government officials develop consumer notification standards and requirements regarding AV technology, safety guidelines, distracted driving notifications and other important information, Travelers and other insurers can use their extensive delivery systems to facilitate communication of those standards to consumers.

Unsafe driving behaviors, like distracted driving, will continue to present challenges.

The evolution toward AVs may eventually help reduce collisions that occur today due to distracted driving. In the meantime, unsafe driving behaviors will continue to present challenges. A Travelers survey in March 2021 found that more Americans are texting and shopping online while driving during the pandemic than in the past.²¹ Similar distracted driving concerns exist in Canada. In a 2020 Canadian Automobile Association poll, 47 per cent of Canadians admit that they have typed out or used the voice-memo feature to send a message while driving.²²

In the lead-up to a fully autonomous transportation system and during the transition period, Travelers is taking on roadway safety issues like distracted driving through its *Every Second Matters*[™] education campaign, led by the Travelers Institute, its public policy division. Programs have been hosted in Calgary, Toronto, Niagara Falls and other locations, and held virtually since the pandemic.

The campaign, which launched in 2017, recognizes that every driver, passenger, cyclist and pedestrian has a role to play in combating distraction and enhancing road safety. Programs held at universities, industry and transportation safety conferences and other public events provide valuable insights on distracted driving risks.



**EVERY
SECOND
MATTERS[™]**

The *Every Second Matters*[™] initiative stands on three key principles:

- Creating a **social stigma** around distracted driving.
- Increasing understanding about **situational awareness** by all roadway users, including elevating the conversation about **pedestrian** and **cyclist safety**.
- Examining scalable **technology** and InsurTech solutions.

To learn more, visit travelersinstitute.org.



CONCLUSION

In summary, Travelers believes that auto insurance can, and will, meet society's needs in an AV world by continuing to compensate affected consumers with speed, fairness and efficiency. Also, any comprehensive AV legal/regulatory structure must include insurance-specific components, including:

- Addressing insurance liability standards as the primary risk transfer mechanism.
- Standardizing data governance and cybersecurity requirements.
- Ensuring representation of the insurance industry in policy-making and stakeholder forums and discussions.

Travelers is committed to offering an insurance solution for AV risks and is providing coverage to AV companies that fit our risk profile in the commercial sector. Travelers looks forward to working with policy-makers and other stakeholders to develop AV insurance policies and regulations that make sense for and benefit this growing industry and its consumers.



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About the Travelers Institute

Travelers established the Travelers Institute as a means of participating in the public policy dialogue on matters of interest to the property casualty insurance sector, as well as the financial services industry. The Travelers Institute draws upon the industry expertise of Travelers senior management and the technical expertise of its risk professionals and other experts, to provide information, analysis and recommendations to public policy-makers and regulators.



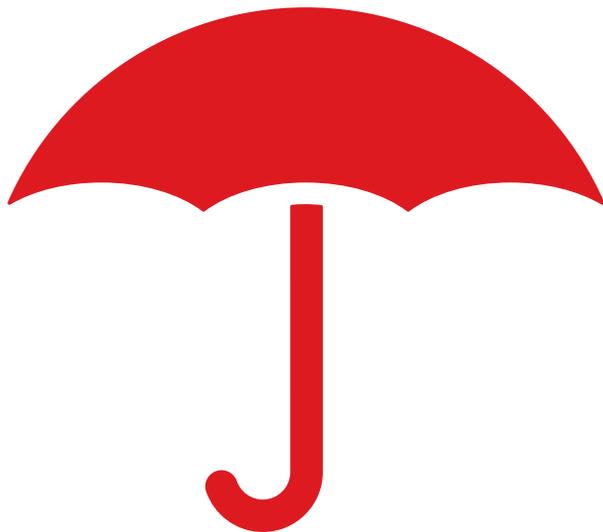
AUTONOMOUS VEHICLES



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M-18578 New 10-21