



Response to July 13, 2026 Hearing on Bill B26-0684 — DC MAAC

Thank you for holding the DC Council Committee for Transportation and the Environment hearing on July 13, 2026, to gather thorough input on the proposed autonomous vehicle (AV) deployment bill (B26-0684). We appreciated the time and thoughtful questions pertaining to the testimonies provided by disabled people and others speaking in support of accessibility.

We look forward to the planned disability stakeholder meetings to discuss policies and legislative language to address full accessibility for AV deployment. In the meantime, we submit this letter for the record to share in more detail policy recommendations to address the issues raised about the current state of AV inaccessibility.

As previously submitted in testimony from the DC Office of Disability Rights¹, failure of AV companies to provide adequate accessibility and equitable service for disabled people will violate multiple existing laws (such as the Americans with Disabilities Act² and the DC Human Rights Act³). The Office of Disability Rights can consult with the DC Council on the legal responsibilities for accessibility and what is required to meet these obligations for equitable service for disabled people. DC already possesses the legal authority, duty, and ethical responsibility to ensure that accessibility requirements are written into any law authorizing AV deployment in its jurisdiction.

Without including clear accessibility requirements and enforcement mechanisms in the AV bill, these issues will be forced to proceed to lengthy and expensive litigation. We hope to avoid this debacle – which would repeat previous historical decisions – through ensuring that accessibility is well defined and prescribed in this law moving forward. Currently, the bill includes scant mention of people with disabilities or accessibility, so we request changes that would mandate provisions for accessibility for a variety of disabilities and equity in serving disabled passengers.

To achieve comprehensive accessibility for disabled people, four categories of requirements pertaining to the vehicles must be added to legislation permitting AV deployment to ensure accessibility for disabled people:

1. Wheelchair accessible for loading and securement;
2. Accessible human machine interfaces (HMI) so that disabled passengers and pedestrians can communicate with and understand AVs and be controlled by riders simply and effectively in multiple ways (through an accessible app, audio, and visual cues) etc;

¹ See DC Office of Disability Rights' written hearing testimony:
<https://lims.dccouncil.gov/Hearings/hearings/2364>

² <https://www.ada.gov/law-and-regs/ada/>

³ <https://code.dccouncil.gov/us/dc/council/code/titles/2/chapters/14/units/A>



3. Detection and responding appropriately to/with disabled pedestrians (service animal users, wheelchair and other mobility device users, etc); and
4. Ensuring the safety of disabled riders and pedestrians, including people with darker skin tones and gender non-conforming people.

We strongly advise (as the DC Multimodal Accessibility Advisory Council or MAAC did in its previous letter⁴) specifically prohibiting AV companies from “referring to another service” for accessibility. While this has been approved in other jurisdictions for AV companies, this approach is inequitable and would strain the already limited number of accessible and operating on-demand (both cab and rideshare) accessible vehicles in DC (just like what happened when rideshare service was originally deployed in DC without any accessible vehicle mandates) — not expand the existing scarce accessible transportation options. Additionally, AV companies are advocating they be allowed to refer disabled customers to the same exact WAV on-demand transportation providers (human-driven taxis) that their business model aims to replace. The growth of inaccessible AVs will lead directly to the destruction of the already meager WAV on-demand transportation services.

The desire of AV companies to eschew responsibility for accessible and equal service for prospective disabled customers is an unfortunate repeat of what was previously approved for rideshare operators in DC. Suggesting that they can send wheelchair users to other services for accessibility (the same as rideshare operators did) results in unequal service (hours, wait times, experience, and likely cost) and is plainly discriminatory. (As shared previously, testing conducted for the successful disability discrimination lawsuit against Uber about the same practice proved longer wait times and higher fares were experienced by disabled customers, resulting in a legal settlement that mandated improvements in accessible service⁵.) If this “separate and unequal” approach were presented as a solution for other minority groups, it would be immediately discarded as illegal and unacceptable.

Additionally, disabled stakeholders have compiled policy solutions listed below. Draft legislative language can be provided for review.

- Zero tolerance antidiscrimination policies specifically naming disabled people citing the DC Human Rights Act and Americans with Disabilities Act.
- Requiring that AV operators provide equivalent service (including wait times, hours of operation, and price) to disabled customers verified by data (comparing wheelchair accessible vehicles vs nonWAVs and disability-identified passengers vs nondisabled) and enforced by the DC regulator (such as the Department for Hired Vehicles, if they should be granted oversight for passenger service).

⁴ <https://www.maacdc.org/assets/docs/maac-av-legislation-letter-2026-04-27.pdf>

⁵ <https://equalrightscenter.org/timeline-lawsuit-uber-2024/>



- Require AV operators to provide access, equity, and safety plans that specifically include people with a variety of disabilities.
- Human Machine Interface accessibility requirements for both within the vehicles (during service) and smartphone app compliant with WCAG 2.1/2.2 Level AA (or better) standards. This includes communicating with riders who are blind or visually impaired, Deaf or hard-of-hearing, or have intellectual or cognitive disabilities. It should include emergency situations and wayfinding for riders to locate a vehicle and safely board.
- WAV (wheelchair accessible vehicle) requirements (with ramped entry and safe securement).
- Safe detection and response to a variety of people with disabilities.
- AV operator reporting requirements: ride requests, rides fulfilled, wait times, hours of operation, cost of ride comparisons between vehicles (with all of this data reporting comparable for WAVs vs nonWAVs).
- Provision of an AV complaint form (similar to one currently provided by DFHV and the Office for Human Rights for cab and rideshare service); public reporting on complaints by type; and response & resolution timeframe.
- Adding AV companies to DFHV's Accessibility Advisory Committee (AAC) and Multimodal Accessibility Advisory Council (MAAC) jurisdictions with meeting attendance requirements, requirement to respond to recommendations within 30 days, and ongoing consultation with disabled people.
- Require AV operators to pay into DC WAV and accessible transportation infrastructure fund⁶.
- Require AV operators and DDOT to conduct a study of accessible (or not) infrastructure (like curb cuts and pick-up/drop-off areas) and collect data on this in areas where they will operate, and make the data available to the public.
- Establish a program prior to deployment and make it known to the public how incidents of an AV injuring or harming a disabled pedestrian or rider and/or their service animal, mobility devices (wheelchair) etc will be processed, compensated, and a reasonable timeframe for doing so.

⁶ See WAV fund recommendation in Kelly Mack/s testimony for the May 26, 2026, Public Works & Operations Hearing concerning the "State of the For-Hire Vehicle Industry": <https://lims.dccouncil.gov/Hearings/hearings/2335>.



Additionally, the MAAC further recommended that any AV legislation explicitly permit and encourage pilots of automated transit buses and shuttles, including extensions of the 2025-2026 Beep/Adastec pilot conducted in partnership with USDOT. Low-floor transit buses are already wheelchair accessible by design, making automated transit the category of AV service where accessibility is most readily achieved and most directly beneficial to disabled riders. Automated shuttles additionally offer a promising first- and last-mile solution for residents in areas underserved by Metrorail and Metrobus, including many neighborhoods east of the Anacostia River. The April 2026 DDOT report⁷ documents that shuttle pilots face genuine operational challenges around weather, speed, and ridership, and for that reason MAAC recommends the legislation authorize and support such pilots rather than mandate them — with a requirement that pilot outcomes be reported to the MAAC and to the DC Council. We also recommend that transit personnel be on board these shuttles to assist with wayfinding, securement, handling emergencies, and other situations where human assistance is needed.

Thus far, no considerations of the impact of algorithmic bias have been explored in the debate about AV deployment planning. As disability advocates documented in a 2022 paper⁸, this is a critical issue that must also be addressed:

“Autonomous vehicles (AVs) have the potential to transform access to transportation and related infrastructure for people with disabilities. AVs and new technologies also come with significant risks of embedding and perpetuating bias and discrimination that permeate society. This brief considers bias within pedestrian detection and collision behavior algorithms, lack of disability representation in the datasets used to train and test AVs, and the need for ethics frameworks that give full recognition to disabled people’s humanity and fundamental rights. Policy measures to mitigate the identified risks are proposed.”

History shows that failing to robustly require transportation accessibility results in segregated, inaccessible, and inequitable services that deny people with disabilities a fundamental freedom: that of moving about freely and in their community. Despite DC Council’s previous efforts and intentions: to this day, on-demand transportation service for wheelchair users in DC is sparse and unequal. This already limited service will decay further with AVs if accessibility is not required and supported through the law, regulations, and enforcement.

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https://ddot.dc.gov/sites/default/files/dc/sites/ddot/DDOT%20Research%20Report%20State%20of%20U.S.%20Automated%20Vehicle%20Policy_April%202026.pdf

⁸ <https://dredf.org/addressing-disability-and-ableist-bias-in-avs/>



DC's disabled residents welcome and encourage ongoing engagement on questions of AV safety and accessibility because it is a new and developing technology. We hope these policy solutions provide useful guidance on steering AVs to providing an accessible service for all.

Thank you for your thoughtful consideration of this testimony.

— Submitted by the [DC Multimodal Accessibility Advisory Council](#)