



December 31, 2018

Miguel Acosta  
Chief, Autonomous Vehicles Branch  
California Department of Motor Vehicles  
Occupational Licensing Compliance Section  
P.O. Box 932342 (MS S441)  
Sacramento, CA 94232-3420

**Re: Autonomous Mode Disengagements for Reporting Year 2018**

Dear Mr. Acosta:

On behalf of Tesla, Inc. ("Tesla" or the "Company"), and pursuant to California Code of Regulations, Title 13, Article 3.7, § 227.46, this submission reports, from November 30, 2017 to December 1, 2018 (the "Reporting Year 2018"), Tesla's data related to the disengagement of autonomous mode in Tesla's autonomous vehicles that participate in the Autonomous Vehicle Tester Program administered by the California Department of Motor Vehicles (the "DMV").

Tesla conducts testing to develop autonomous vehicles via simulation, in laboratories, on test tracks, and on public roads in various locations around the world. Additionally, because Tesla is the only participant in the program that has a fleet of hundreds of thousands of customer-owned vehicles that test autonomous technology in "shadow-mode" during their normal operation, Tesla is able to learn from billions of miles of real-world driving to develop its autonomous technology. In "shadow mode," we may run features in the background without actuating vehicle controls or receive data back about roadway situations we are specifically targeting in order to train our system to perform better in the real world. We analyze this data from our customer fleet via over-the-air transmissions. These techniques help Tesla to safely develop improvements to our existing Autopilot advanced driver assistance system and future self-driving system.

To date, Tesla's worldwide customer fleet has driven over 1B miles using Autopilot. In Q3 2018, Tesla vehicles experienced 1 crash for every 1.92 million miles driven. In the same timeframe, Tesla vehicles experienced 1 crash for every 3.34 million miles driven with Autopilot engaged. By comparison, NHTSA most recently reported the nation's average is about 1 crash for every 436,000 miles. Tesla Autopilot driver assistance system has substantially improved the rate of crash.

For Reporting Year 2018, Tesla did not test any vehicles on public roads in California in autonomous mode or operate any autonomous vehicles, as defined by California law. As such, the Company did

not experience any autonomous mode disengagements as part of the Autonomous Vehicle Tester Program in California.

Should the DMV have any questions or comments regarding this submission, please feel free to contact me at [aprescott@tesla.com](mailto:aprescott@tesla.com).

Sincerely,

A handwritten signature in black ink that reads "Al Prescott". The signature is written in a cursive, slightly slanted style.

Al Prescott

*Deputy General Counsel and  
Director of Regulatory Affairs*