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Attn: Automated Vehicle Team
National Transport Commission
Level 3/600 Bourke Street
Melbourne VIC 3000
automatedvehicles@ntc.gov.au

Discussion Paper: Motor Accident Injury Insurance and Automated Vehicles

Thank you for the opportunity to provide feedback on the discussion paper.

Allianz views autonomous vehicles as a natural extension of the broad societal shift towards automation and globalisation. As such, we do not anticipate undue difficulty in adapting our insurance products and services to suit automated vehicles. Allianz concurs with the working party that Option 3 is preferred. We believe this option provides consistent levels of rehabilitation and compensation to injured persons, is cost effective, and has the least impact to existing laws and judicial processes. We view the reinsurance pool as unnecessary and suggest that the frictional costs may outweigh any benefits.

Allianz supports the principles espoused on page 2 of the discussion paper; however, we suggest a further two principles for consideration:

1. Existing laws and judicial processes should be relied upon to the greatest extent possible. In the event that practical difficulties are encountered, reforms should be enacted to address the specific difficulties.
2. Occupants of a vehicle who have the capacity to control a vehicle (e.g. by sitting in the driver's seat), should retain the legal duty to control the vehicle in response to novel or adverse circumstances when reasonable to do so. This should be reviewed when the majority of vehicles on Australian roads are at automation levels 4 and 5.

Allianz concurs with the more detailed submission of the Insurance Council of Australia.

We look forward to working with the committee and insurance regulators to implement the laws necessary to confirm that motor accident schemes will respond to injuries arising from the use of automated vehicles.

Please do not hesitate to contact the author on 02 8258 6680 or tony.mobbs@allianz.com.au.

Yours sincerely



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