



Owner-Operator Independent Drivers Association

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The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # DOT-OST-2021-0005, “Request for Comments: Automated Vehicles Comprehensive Plan”

Dear Secretary Buttigieg:

The Owner-Operator Independent Drivers Association (OOIDA) is the largest trade association representing the views of small-business truckers and professional truck drivers. OOIDA has over 150,000 members located in all fifty states that collectively own and operate more than 240,000 individual heavy-duty trucks. OOIDA’s mission is to promote and protect the interests of its members on any issues that might impact their economic well-being, working conditions, and the safe operation of commercial motor vehicles (CMVs) on our nation’s highways.

Professional truckers have a keen interest in the development and deployment of autonomous vehicles (AVs) as these technologies have the potential to drastically change the trucking industry, in particular its workforce. The U.S Department of Transportation’s (DOT) *AV Comprehensive Plan* attempts to outline the integration of Automated Driving Systems (ADS) into the surface transportation system, but still maintains a voluntary approach that has failed to provide necessary transparency about actual safety performance. The continued reliance on voluntary safety reporting from AV manufacturers will not effectively build public trust, acceptance, and confidence in the testing and deployment of these vehicles.

The *AV Comprehensive Plan*’s strategy to “promote collaboration and transparency” does not adequately ensure an open safety reporting environment. While the AV Test Initiative is supposed to provide the public with direct and easy access to information about the testing of ADS-equipped vehicles, there are no mandatory guidelines for AV developers to register or even submit testing results. For instance, there are currently a handful of AV trucking companies signed up, but there are no substantive details about their safety performance. Instead of specific testing results, their documents primarily discuss potential benefits and serve as promotional materials.

OOIDA believes that any process to advance automated technology should be met with mandatory data transparency from manufacturers. This will help educate consumers, the industry, and regulators about the actual reliability of autonomous technology. Data transparency is essential to ensure the

safety of the motoring public. Regrettably, the *AV Comprehensive Plan* maintains a self-certification approach and voluntary reporting as the way to balance and promote safety and innovation.

Without improving data transparency, DOT will encounter challenges attempting to modernize and amend regulations. OOIDA understands necessary changes must be made to the Federal Motor Carrier Safety Regulations (FMCSRs) to accommodate AVs, including training, licensing, and inspection standards. However, many of the proposals discussed within the Federal Motor Carrier Safety Administration's (FMCSA) 2019 Advance Notice of Proposed Rulemaking (ANPRM) are hypothetical in nature. In this sense, OOIDA questioned why the Agency focused on regulations that may or may not be necessary depending how the technology performs. Most of the questions laid out in the ANPRM were based on assumptions, many of which are nothing more than marketing ploys from ADS developers. In reality, it is difficult to fully understand what role AVs will have on the trucking industry. Without more concrete data about how AVs will function and their impact on the industry, the issues addressed in the ANPRM and any other further rulemaking is generally speculative.

Clearly, DOT and FMCSA must continue learning more about the impacts that AVs will have on the trucking industry. As such, OOIDA is supportive of DOT's efforts to discover how AVs might impact the CMV workforce. Professional drivers will be among the first to experience the technology's shortcomings or deficiencies outside of controlled testing scenarios, potentially creating serious safety concerns for our members and the motoring public. OOIDA members and millions more working in other segments of trucking face a particularly uncertain future as technology might first diminish the quality of their jobs and then threaten to displace them completely. OOIDA will continue being part of any stakeholder outreach, especially questions and research related to small-business trucking.

The potential introduction of AVs on the nation's highways invites more questions than answers. As autonomous technology develops, OOIDA is concerned that federal regulators will push for more technology as the solution to the industry's safety and workforce issues without considering the negative impacts of these technologies. Regardless of their potential, it is important to understand the implications that AVs will have on public roadways. Despite the various claims that AVs will lead to zero deaths, there have been real-world situations in which automation has devastatingly failed. While AVs might improve safety under certain conditions, they create new risks with dangerous outcomes. Beyond ensuring that regulations provide appropriate standards for the safe operation of AVs, DOT must consider unforeseen concerns and practices that might offset the potential safety, mobility, and sustainability benefits from the technology.

Unfortunately, the *AV Comprehensive Plan* once again falls short of implementing the necessary requirements for technology developers and manufacturers that would win public confidence in the testing and deployment of AVs.

Thank you,



Todd Spencer
President & CEO
Owner-Operator Independent Drivers Association, Inc.