



Owner-Operator Independent Drivers Association

National Headquarters: 1 NW OOIDA Drive, Grain Valley, MO 64029

Tel: (816) 229-5791 Fax: (816) 427-4468

Washington Office: 1100 New Jersey Ave. SE, Washington, DC 20003

Tel: (202) 347-2007 Fax: (202) 347-2008

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Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # FMCSA-2019-0049, “Qualifications of Drivers; Vision Standard”

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.

OOIDA supports amending regulations to permit individuals who cannot meet either the current distant visual acuity or field of vision standard, or both, in one eye to be physically qualified to operate a CMV in interstate commerce. We agree that the rule will offer a performance-based approach and will help eliminate excessive waiting times for drivers that can meet the proposed vision standards.

The research presented demonstrates that individuals with monocular vision can safely operate a CMV. There is also considerable medical literature indicating that individuals with vision loss in one eye can and do develop compensatory viewing behavior to mitigate their vision loss. In many cases, drivers with decades of experience without any at-fault crashes have to leave the profession because of the economic obstacles associated with the current monocular vision standards. The prolonged period of required intrastate driving can discourage these drivers from staying in the industry. We believe the proposed reforms will allow safe and experienced drivers to stay on the road.

The alternative process that still requires consultation with and approval from medical professionals will also help eliminate time and paperwork burdens that are required under the FMCSA vision exemption program. This will save some costs for monocular drivers and reduce barriers to entry for both active and future CMV drivers.

Given the research that shows the proficiency of monocular drivers, FMCSA should advance the proposal to amend the current vision standards. The proposed rule ensures sufficient physical

qualifications are met, but also establishes a more practical process that will help safe drivers continue to operate in the trucking industry.

Thank you,

A handwritten signature in black ink, appearing to read "Todd Spencer". The signature is written in a cursive style with a prominent loop at the end.

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