



Owner-Operator Independent Drivers Association

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May 24, 2021

The Honorable Meera Joshi
Deputy Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # FMCSA-2018-0152 “Extension of Compliance Dates for Medical Examiner's Certification Integration”

Dear Deputy Administrator Joshi:

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.

The recent proposal to once again delay the compliance date for several provisions of the 2015 Medical Examiner's Certification Integration final rule is another troubling setback for FMCSA’s Information Technology (IT) infrastructure. Since issuing the 2015 final rule, there have been ongoing challenges associated with launching a new National Registry IT system, including an attempted cyberattack on the National Registry website in December 2017. These continued IT failures are unacceptable, especially as more and more agency systems transition to an online platform including the Entry-Level Driver Training Provider Registry.

We hope that FMCSA will finally address these repeated IT shortcomings to ensure highway safety for all road users and protect personal privacy for drivers. We encourage the agency to provide consistent updates to industry stakeholders and the public as implementation of the Medical Examiner's Certification Integration final rule moves forward.

More broadly, FMCSA should also realize that some technologies do not always deliver on their promise. The agency should reject any rush to mandate unproven technology systems such as automatic emergency brakes, speed limiters, or whatever is being promoted as the next magic

bullet to improve highway safety. The development of technology related regulations must be conducted in a thorough manner with comprehensive oversight. If not, professional drivers will be among the first to experience any technology's shortcomings, potentially creating serious safety concerns for our members and the motoring public.

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.