



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 20001
Tel: (202) 347-2007 Fax: (202) 347-2008

March 23, 2022

Thomas Keane
Associate Administrator, Office of Research and Registration
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # FMCSA-2021-0089, “Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Consumer Complaint Database”

Dear Mr. Keane:

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 approximately 150,000 members located in all fifty states and Canada who collectively own and operate more than 240,000 individual heavy-duty trucks. OOIDA members have experience using the National Consumer Complaint Database (NCCDB) to file complaints against unsafe and unscrupulous companies and/or their employees, including shippers, receivers and transportation intermediaries.

We support FMCSA’s plans for updating the NCCDB, including making the interface easier for system users to file complaints and adding the option for the system user to select broker allegations specific to property carriers when filing their complaint. We also hope FMCSA will improve efforts to respond to every complaint promptly, thoroughly investigate all valid complaints, and initiate enforcement action when applicable.

In addition to these changes, Congress has recently initiated a review of the program. Section 23016 of the *Infrastructure Investment and Jobs Act* enacted in November 2021 requires the Government Accountability Office (GAO) to examine the NCCDB and evaluate the effectiveness of efforts to consider and follow-up on complaints submitted to the database, the types of complaints, and general awareness of the database. Now that FY2022 Appropriations legislation has been approved, we encourage FMCSA to collaborate with GAO as soon as possible so necessary changes to the NCCDB can be swiftly implemented.

We maintain our concerns about the ambiguity of the name “National Consumer Complaint Database.” This title is misleading and does not signify a connection to the trucking industry in any way. OOIDA believes the NCCDB can help improve safety, but many drivers are unaware

that the NCCDB is available for them to report violations of commercial regulations, nor are they aware that coercion complaints can be handled through the NCCDB. While the agency indicates that the database received over 18,000 total complaints in 2021, this does not specify how many complaints were from motor carriers and/or drivers. One possible suggestion for a more logical name would be the “National Truck Safety Hotline and Consumer Complaint Database.” We believe further analyzing the name of the program will be a critical component of the GAO review, especially as GAO makes recommendations regarding stakeholder awareness and participation.

Although this Information Collection Request is necessary for the agency to perform its mission, we hope the changes mentioned in the notice along with the forthcoming GAO review will expedite FMCSA’s efforts to improve the NCCDB.

Thank you,

A handwritten signature in cursive script that reads "Todd Spencer".

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