

JC Powell - Comments

Change happens and in this instance the change should be made with the number one priority to make the roads safer for all.

Given the tasks set forth and the inevitable roll out of Automated Driving Systems, all manufacturers and trucking companies should be expected to provide the government with all of their test results and incident reports so that everyone can learn from these mistakes. Hiding this information from the public will not encourage the adoption and acceptance of "robots" driving huge commercial vehicles on roads that are also traveled on by our babies, children, spouses and parents.

With the roll out of all SAE stages of automated driving, there should be nothing hidden from the public by the manufacturers and the trucking fleets. These robotic products directly subject the public to potential significant harm. Just like drug companies disclose their drug make-up to the FDA and public, so as to warn the public, the sellers and users of automated driving systems should disclose the make up of their systems to the public. A timed license may be given, like a drug, to the manufacturer but the public should know what is inside the robot truck. When one of these systems fail, like Uber's March, 2018 Arizona fatality, the public should be provided and have access to the all of the information. This will help the public determine whether Automated Driving is safe at this time. There is too much information being hidden from the public and this results in fear.

Distracted driving and fatigued driving is a serious danger in 2018 and in the foreseeable future. Distracted driving and fatigued driving is often not considered as a cause of a crash. as it is difficult to determine. Presently, regulations do not require equipment to monitor for distractions and fatigue. It is illegal to operate a commercial vehicle in either a state of distraction or fatigue but there is difficulty in determining whether a driver was distracted or fatigued at the time of the crash. With the automation of the driver's cabin, we should strive to implement all reasonable driver cabin safety automation.

While we have humans behind the steering wheel, (not SAE Level 5), and certain manufacturers and trucking fleets are spending a significant sum to develop proposed regulations for the implementation of SAE Level 5 robotic driving, we should require the use of the available tools to monitor for distraction and fatigue. This will allow the determination of the potential savings or costs of robotic driving. The data obtained may make commercial driving safer and allow the FMCSA and DOT to assess what additional equipment is effective in the prevention of distracted driving and fatigued driving.

The current FMCSA safety regulations have been presumably adhered to by various manufacturers of autonomous driving systems and trucking fleets. A gradual roll out to allow public monitoring of these various systems should take place. During the roll out, autonomous driving should be limited to certain hours with gradual softening of use of phones but with the implementation of distracted driving warning systems and fatigue prevention systems. Later, "skilled" or "in training" drivers may replace CDL licensed drivers of SAE Level 3 and Level 4 vehicles. This will increase employment opportunities and allow more truck driving jobs. The requirements to be an "ADS" driver should be less than that of a CDL. The automation of the vehicles should require self diagnosis before operating, thereby allowing minimal training for an ADS operator.

Creating regulations for SAE Level 5 driving would benefit manufacturers but the public has not seen the data to allow the adoption of regulations for SAE Level 5 operation. The safety data has not been adequately publicized to the public to regarding the necessary regulations of SAE Level 5 operation.

With the adoption of the ELD, trucking safety will increase. But it took years for the adoption of ELD. The public can wait for a few more years before the implementation of robotic trucking on public

roads. Speeding to a result, especially a SAE Level 5 regulation, is like a truck speeding down a steep mountain. Someone will get hurt in the rush downhill.

A slow roll out, under another short term waiver of regulations, with SAE Level 3 and 4 at night on empty roads with non-cdl drivers monitored for too much distraction and too much fatigue should be seen from behind the steering wheel should be the next step.

Trying to steer around what is over the horizon is not the safe path for the adoption of SAE Level 5 robotic driving at this time.