

## SBTC Comments Concerning Testing and Deployment of Automated Driving Systems-Equipped Commercial Motor Vehicles on Public Roads.

### BACKGROUND

The Small Business in Transportation Coalition is a 501(c) (6) non-profit trade organization with over 14,000 dues paying members from all 50 states and the District of Columbia. The SBTC represents, promotes and protects the interests of small businesses in the transportation industry. We encourage ethical business practices and support teamwork, cooperation, transparency, and partnerships among truckers, carriers, brokers, forwarders & shippers who seek to do business with the utmost integrity.

Our membership opposes the Automated Driving Systems (“ADS”) in Commercial Motor Vehicles (“CMVs”) because we believe a professionally trained, certified human driver is best suited to safely control CMVs on the interstate and prevent accidents that entail serious personal injury and fatalities. America’s Truck Drivers have the knowledge, skills and abilities to act quickly to respond in dangerous situations to ensure the safety of other motorists and themselves. Additionally, SBTC believes Congress and the Federal Motor Carrier Safety Administration (“FMCSA”) should NOT mandate the use of ADS, as they have done with electronic logging devices.

The FMCSA is proposing 5 levels of ADS interaction, and for the purposes of this Notice, is focusing on SAE Level 3 (Conditional Driving Automation), SAE Level 4 (High Driving Automation), and SAE Level 5 (Full Driving Automation). SBTC opposes all these levels because we believe the more a driver relies on an ADS for any level of operation of the CMV, the greater the possibility of accidents and injury to the driver and other motorists.

#### *Inspection, Repair and Maintenance*

SBTC believes that if an ADS is installed in a CMV, drivers should be thoroughly trained in the operation of the device so that they can thoroughly inspect and maintain an ADS. Again, SBTC does not believe ADS should be mandated in CMVs, but if they are, the FMCSA should provide free training and certification so that drivers can safely maintain and operate the ADS.

#### *Roadside and Annual Inspections*

SBTC is concerned that drivers would face additional roadside inspections and unfavorable interaction with other road users if CMVs were visibly marked to show that an ADS was in use and the SAE Level being used.

#### *Distracted Driving and Driver Monitoring*

SBTC promotes driver safety at all levels. We believe drivers should follow the handheld device usage law of the state in which they are travelling while they are operating a CMV in that state. We believe drivers should maintain the same level of alertness regardless of whether an ADS is in use or not. We are concerned that if an ADS is in place and operating, drivers may become dependent on it and lower the focus and alertness they would have if the ADS was not in place.

#### *Hours of Service for Drivers*

Hours of service regulations have always been a subject of concern for SBTC members. Our members follow the regulations and are currently complying with the recently enacted ELD mandate. Our

members maintain control of their CMV always, and would continue to monitor, maintain and control their CMV whether an ADS is in place and operating or not. WE DO NOT WANT AN ADS TO REPLACE A TRAINED, CERTIFIED DRIVER AT ANY LEVEL. Therefore, we believe drivers should record their hours of service just as they would if an ADS was not in place and operating.

#### *Commercial Driver's License (CDL) Endorsements*

SBTC believes CMV drivers should have the training, knowledge and skills to safely operate an ADS. Drivers should understand the capabilities and limitations of the advanced technologies and they should know and understand when it is appropriate to rely on an ADS rather than manual operations. SBTC does NOT believe that an ADS-equipped CMV should ever be deployed without a trained and certified driver onboard.

#### *Conclusion*

In conclusion, SBTC opposes the use of an ADS at SAE Level 3, 4, or 5. We believe that a professionally trained and licensed human driver in full operation of the CMV is necessary for public safety. ADS technology has not been proven to be reliable enough to replace human drivers, and we believe it is in the public interest to not allow the use ADS at SAE Levels 3, 4, or 5 in any CMVs at the present time.

Sincerely,

James P. Lamb

SBTC President