



Alliance for Driver Safety & Security

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100 M Street SE, Suite 600 • Washington, DC 20003

May 10, 2018

Mr. Michael Huntley
Division Chief – Vehicle and Roadside Operations Division
Office of Carrier, Driver, and Vehicle Safety
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590-0001.

Re: Docket Number FMCSA-2018-0037 Request for Comments Concerning Federal Motor Carrier Safety Regulations (FMCSRs) Which May Be a Barrier to the Safe Testing and Deployment of Automated Driving Systems-Equipped Commercial Motor Vehicles on Public Roads

The following comments are submitted on behalf of the Alliance for Driver Safety & Security, also known as the Trucking Alliance. The Trucking Alliance is a leading supporter of safety reforms to improve the safety and security of commercial drivers and to lower the number of large truck crashes on US highways. More information on the Trucking Alliance, its member companies and policies can be found at: <http://truckingalliance.org/>

The Trucking Alliance supports the development of advanced vehicle technologies. These technologies can enable commercial drivers to utilize highly automated driving systems, enhancing their safety and security.

The Trucking Alliance supports the use of these technologies to achieve safety performance levels that rival commercial airlines and their record of safety, which if fully implemented, can eliminate large truck crashes.

However, the Alliance strongly believes that a properly trained commercial driver should be present in all trucks that incorporate advanced vehicle technologies. The Trucking Alliance does not currently support the implementation or, in all but restricted instances, the testing of driverless tractor trailers on public highways. The Trucking Alliance:

1. Supports advanced driver assisted technologies in commercial vehicles, rather than commercial vehicles that rely solely on full automation.
2. Believes that commercial drivers are an indispensable asset to the safe operation of commercial vehicles.
3. Maintains the principle that commercial drivers are necessary to improve the safety and security of the general public.
4. Believes that commercial drivers are integral to supply chain accountability, as well as managing unforeseen weather events, emergencies, detours, vehicle conditions, computer software programs, cybersecurity disruptions, cargo security, and in providing efficient customer services.”

Generally, the Alliance encourages the FMCSA to retain language in its Voluntary Guidance that will require a commercial driver to be present in the tractor trailer at all times, particularly when the vehicle is operating on public highways within a few feet of the motoring public.

Regards,

(Originally Signed)

Lane Kidd
Managing Director
The Trucking Alliance
Washington, DC 20003