

## John Cantlay - Comments

FMCSA regulations should not be reduced to assist in the testing of Automated Driving Systems. To do so would be like allowing an unlicensed commercial driver to drive a commercial vehicle on any public highway.

If this automation is to work it must work under all situations, all climates, and all circumstances that desire quick reactions for the safe control of the vehicle. In order to verify that the system functioned correctly a licensed commercial driver should be sitting in the seat behind the wheel viewing the activity of the system.

Remember, the rules established by the FMCSA were designed to not only allow the safe movement of commercial business over the public highways but also to protect the driving public from the unsafe actions, whether accidental or not, of a carrier or vehicle. Many of your rules were established AFTER the occurrence of many unfortunate accidents that incurred injuries and even death to the driving public. I am sure if you put some thought to it you would remember the early disc brake rule that was implemented to eliminate a faulty brake system that caused many a heart ache.

Automation will get here soon enough but you need to make sure that you do not accept the words and data only from the manufacturer. You must be sure that the system is functioning 100% of the time, 365 days a year under all situations.

Once you allow the system to be used you are reducing the experience level of every commercial driver to be able to "take the wheel" when the system fails. We all learn by experience.