

Greg Bell - Comments

Subject: 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;
Docket No. FMCSA-2018-0037

I hereby submit the following comments concerning the above-reference subject.

First and foremost, a properly trained commercial driver should be behind the wheel of Commercial Motor Vehicles (CMVs) at all times, regardless of any automated driving technologies that may be available on CMVs. And, current FMCSRs should be comply with to ensure the safety of the public governing safe testing and deployment of ADS-Equipped CMV on public roads.

In addition, the development, testing or deployment of Automated Driving Systems (ADS) for CMVs should not in any way weakening regulations such as those that applied to driver hours-of-service.

There are too many unknown factors regarding the testing and deployment of ADSs, and a lack of transparency concerning related information. Data related to the testing and deployment of ADSs must be made public. Including, when crashes (regardless of severity) involving automated driving system-equipped CMV happen, there should be regulations requiring their reporting and to make all relevant data available to the public.

The above-referenced subject, as written suggest that existing public safety FMCSRs governing CMVs on public roads should not apply to testing and deployment of ADS-Equipped Commercial Motor Vehicles on Public Roads. To the contrary, current regulations are not a barrier to automated driving system testing and deployment, but rather a necessity to ensure safety on public roads.

Testing and deployment of ADS-Equipped CMVs should comply with Federal Motor Vehicle Safety Standards without exemptions. I believe that efforts should focus on providing additional safety standards concerning the testing and deployment of ADS-Equipped CMVs, as opposed to discussions on how to help private companies get around current Federal Motor Vehicle Safety Standards and Regulations.

I believe it is the public interest that a properly trained commercial driver should be behind the wheel of CMVs at all times, regardless of any automated driving technologies on CMVs, and current FMCSRs should be comply with to ensure the safety of the public governing safe testing and deployment of ADS-Equipped CMV on public roads. Moreover, focus should be on additional safeguards on the testing and deployment of ADS-Equipped CMVs.

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