## J Hobbs - Comments

I offer the unique perspective of being both a law enforcement officer and a truck driver. Combined with my father we have over 7 million miles in a commercial vehicle. There are so many situations out here daily that a driver has to be ready for, from road hazards to equipment failure that requires immediate attention. Tire failures, electrical issues that can cause a truck to lose all power and be a hazard at night especially. There is also the potential for fire from not only overheated brakes but now with ultra low sulfur diesel and high exhaust temps on emission systems which is where fire extinguishers come in handy, and the respective placing of triangles at 10, 100 and 200. (Flashers are not always a practical solution if you dont have battery power either)

As someone who drives the highways at night and have patrolled at night, I can say that I have seen the dangers of a vehicle that has lost power and not been able to get off the road, which is ultimately the solution most ADS system designers offer. I have seen accidents with serious injury take place. These trucks today have multiple reasons that they will shut down almost immediately with no warning. I have been behind the wheel many times when this happened and had to act very quickly to signal traffic to move over as I figured out why I lost all power. I have also seen other equipment failures from wheels coming off the hub entirely disabling the trucks steering, to trailers coming detached just recently and injuring others.

Currently, almost every major truck manufacturer has a safety recall from transmissions that wont disengage and increase accident likelihood to fifth wheel recalls that allow the trailer to detach at any time, and even service brake recalls on 2018-19 models. I currently drive a 2018 International LT that has stranded me on the fuel island refusing to go into gear and also I have been in school traffic as recent as last week where the computer wouldnt release the brakes on the transmission hill assist feature. I have had major air leaks develop and cause the brakes to lock up, and bear in mind I have passed 16 inspections with no violations which my CVSA score will prove. I carry tools with me to try to fix issues as quickly as possible so they do not endanger the public.

The issue with an ADS system not having someone on board, even if its remotely controlled like Starsky suggests, is that no matter how good the maintenance program is, problems still arise in a split second. When a truck breaks down, especially impeding traffic, most states do not have emergency personnel working at night as local fire departments are usually volunteer and most sheriffs dept are on call after certain hours, along with the highway patrol. Essentially, it means that disabled vehicle could be dead in the road for 30 minutes or easily longer unattended until help arrives. It has also been my experience that a roadside call, even for something as simple as a tire, can take up to 3 hours. If a tire blows out on a bridge and you lose steering, that truck can not get out of the way of traffic, especially on a bridge like the Ponchatrain in Louisiana, or West Memphis Arkansas where people have died crashing into disabled vehicles. There is too much at stake safety wise to leave a vehicle unattended.

A person operating an ADS equipped CMV should be held to the same standards as any other CMV operator. If they are monitoring the truck as it operates in ADS mode, the HOS should apply the same, and distracted driving laws shouldnt be changed. While ADS designers can demonstrate a trucks ability to maintain its lane and brake when it senses a need, it cannot account for all the random outliers that people like myself have seen. With respect to an ADS attendant needing a CDL, it would behoove the committee to observe any trucking school in its early classroom stages to see if a person with little formal training is mentally and physically equipped to take the controls, especially in situations where there is difficult to navigate detours, road construction traffic that makes you drive partially on the shoulder, powerful rainstorms that pop up all of the sudden and obscure your vision ten feet ahead, and wind storms like the ones in Kansas that just blew over 20 trucks last week.

The committee should spend time out on the highways observing the lack of emergency services support at night, talk to both company and independent mechanics about the reliability issues and breakdowns of todays trucks. Go to truck stops and talk to drivers about how long they sit broke down, how poorly some of these systems like Wabco and Bendix operate as they slam on brakes for no reason and fault out and even cause Jacknifes, regardless of what the manufacturers suggest. It would also be wise to go to sites like The Truckers Report and learn the issues drivers deal with constantly.

The subject certainly needs more input from people with actual experience.