

Comment from Shelli Conaway

Questions:

1. I feel that a study and lengthy pilot programs supervised by FMCSA after all initial testing and development phases would be beneficial before releasing to the commercial market. Human drivers are a safety device for these vehicles that would be not only beneficial for the public but also for the labor market. Requirements of a human driver will ensure constant systems monitoring as well as someone to handle problems and perform other safety critical functions.

2. I would think it would be of utmost importance for ANY operator of these vehicles to be trained as a standard CDL Class A Driver along with any endorsements that would be required for the tasks and shipments to be operating with. But also the Operator should have specialized training on the controls of the ADS as well as any programming troubleshooting and emergency procedures for these vehicles. A special endorsement should be earned to show the training and testing on this type of system, much like school for a Class A driver. So yes.. the operator should be trained and licensed to do both.

3. As for HOS for these types of scenarios my first concern is that a program or a study be conducted to determine if a driver is truly rested when in the sleeper or off duty during times of auto drive or remote drive of these vehicles. I feel that the idea of sleeping without someone in control may cause disruptions to the quality of sleep for these operators and may result in driver fatigue. Once that can be safely determined then revisit HOS for these type of operations.

HOS for remote operators should be the same or more stringent than current HOS. This is new technology and once data is accumulated to determine the actual tolls of the job then changes can be made. The job still entails long hours sitting and watching a screen/windshield and can be daunting.

4. Medical qualifications should stay consistent with current standards and requirements.. An Operator can have a medical emergency sitting in a chair just like a driver can on the highway.

5. Current distracted driving rules and laws should remain for all, even though they are not in the truck, they should still have all their attention to the safe operation of the vehicle. Safety operators should also be restricted from performing other functions while supervising the auto drive portion of a trip.

6. Yes, any human exercising control of an ADS-equipped vehicle must continue to comply with all the rules under Part 392, and (2) a CMV under the control of a Level 4 or Level 5 ADS must satisfy the operational rules

10. When they put these trucks on the road this information should be made available to FMCSA and DOT, they cannot expect to be allowed to operate with out disclosure, much like truck manufacturer, they have to ensure that the systems are safe for the public.