



Owner-Operator Independent Drivers Association

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April 2, 2020

Mr. Finch Fulton
Deputy Assistant Secretary for Transportation Policy
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # DOT-OST-2019-01479, “Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0”

Dear Deputy Assistant Secretary Fulton:

The Owner-Operator Independent Drivers Association (OOIDA) is the largest trade association representing the views of small-business truckers and professional truck drivers. OOIDA has more than 160,000 members located in all fifty states that collectively own and operate more than 240,000 individual heavy-duty trucks. OOIDA’s mission is to promote and protect the interests of its members on any issues that might impact their economic well-being, working conditions, and the safe operation of commercial motor vehicles (CMVs) on our nation’s highways.

Our members have a keen interest in the development and deployment of autonomous vehicles (AVs) as these technologies have the potential to drastically change the trucking industry, in particular its workforce. AVs are being touted as a solution for federal and state agencies that regulate the trucking industry to meet their goals for fewer crashes and zero fatalities, while at the same time reducing congestion and pollution. As the U.S Department of Transportation (DOT) continues developing the framework for automation in the surface transportation system, DOT must also consider unforeseen concerns and practices that might offset the potential safety, mobility, and sustainability benefits from AVs.

Unfortunately, *Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0* (AV 4.0) perpetuates many of the shortcomings included within DOT’s *Preparing for the Future of Transportation: Automated Vehicles 3.0* (AV 3.0). AV 3.0 lacked substantive data to support its “vision,” and prematurely proposed eliminating a human driver from operating an automated CMV. Additionally, AV 4.0’s continued reliance on voluntary safety-assessments from manufacturers will not effectively build public trust, acceptance, and confidence in the testing and deployment of AVs.

Clearly, DOT and the Federal Motor Carrier Safety Administration must continue learning more about the impacts that AVs will have on the trucking industry. As such, OOIDA is supportive of DOT's efforts to discover how AVs might impact the CMV workforce. Professional drivers might be among the first to experience the technology's shortcomings or deficiencies outside of controlled testing scenarios, potentially creating serious safety concerns for our members and the motoring public. OOIDA members and millions more working in other segments of trucking face a particularly uncertain future as technology might first diminish the quality of their jobs and then threaten to displace them completely. OOIDA will continue being part of any stakeholder outreach, especially questions and research related to small-business trucking. We eagerly await DOT's upcoming Congressionally mandated report on the impact of AV technologies on workforce.

OOIDA believes that any process to advance automated technology should be met with mandatory data transparency from manufacturers. This will help educate consumers, the industry, and regulators about the actual reliability of autonomous technology. Data transparency is essential to ensure the safety of the motoring public. Regrettably, AV 4.0 reaffirms a self-certification approach and voluntary reporting as the way to balance and promote safety and innovation.

The development of AV technology will dramatically transform the transportation industry, but the professional CMV drivers and millions more working in other segments of trucking face a particularly uncertain future. Thus, DOT must take careful and proper steps to ensure that AVs optimally serve both the general public and the industries they will impact. Unfortunately, AV 4.0 again falls short of implementing the necessary requirements for technology developers and manufacturers that would win public trust, acceptance, and confidence in the testing and deployment of AVs.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Todd Spencer". The signature is written in a cursive, flowing style.

Todd Spencer
President & CEO
Owner-Operator Independent Drivers Association, Inc.