



A bold voice for transportation workers

April 2, 2020

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

**RE: Ensuring American Leadership in Automated Vehicle Technologies:
Automated Vehicles 4.0
Docket No. DOT-OST-2019-0179**

Dear Mr. Fulton:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to DOT's request for comment on its document entitled "Ensuring American Leadership in Automated Vehicle Technologies: Automated Vehicles 4.0 (AV 4.0)." TTD consists of 33 affiliate unions representing workers in all modes of transportation, including those who will be impacted by the development and deployment of automated vehicles. We therefore have a vested interest in this policy.

AV 4.0 builds upon DOT's previous automated vehicle guidance and discusses the roles, activities and jurisdictions of 38 federal departments performing work related to AV technologies. The wide-ranging scope of federal involvement outlined in the document speaks to the far-ranging reach and implications of automated vehicle technology.

Across these efforts, TTD has long called for DOT to outline meaningful regulatory frameworks to ensure these technologies are held to high safety standards. Additionally, we have urged DOT to provide due consideration to the labor market impacts automated vehicles will cause, and the future of the transportation workforce. Unfortunately, AV 4.0 is another deeply unserious document that more closely resembles an industry advertisement than leadership in policymaking.

We continue to reject DOT's prescription that "non-binding guidance" or "voluntary consensus standards" for manufacturers, transit agencies, and others are in any way adequate. The Department states that it supports "flexible, technology-neutral policies that will allow the public

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Larry I. Willis, President / Greg Regan, Secretary-Treasurer

to choose the most economically efficient and effective transportation and mobility solutions.” However, by refusing to mandate regulatory standards and industry practices, DOT denies the public the ability to make informed choices about technology and its safety, instead allowing unfettered and self-regulated entities to make these decisions themselves. Ongoing efforts to develop easily ignored “reference guides” that purport to cover issue areas as broad as vehicle maintenance, human factors, labor and training issues, customer communications, maintaining consistency in the passenger experience, and transit service planning in lieu of watchful oversight and the development of appropriate regulation is nothing more than abdication of the Department’s safety mission.

Further, TTD continues to be disappointed in DOT’s lack of interest in workforce impacts and the future of work in the transportation sector. It is encouraging that AV 4.0 discusses ongoing FTA research on “economics and workforce considerations associated with AVs”, and we look forward to reviewing the agency’s findings.

However, as 4.0 outlines, automated vehicles may ultimately be deployed across broad swaths of the economy. It is thus incumbent on DOT to not only embark on exhaustive and rigorous research on employment disruption and dislocation across all potential applications of AVs, but also to preemptively address these impacts. As we have stated in previous comments on AV guidance, this may include financial support for displaced workers alongside continuous and recurrent training and retraining programs to allow employees to take advantage of new opportunities in affected sectors, whenever possible. DOT must pursue these considerations well before any industry-altering changes take effect.

TTD looks forward to working with DOT and its modal agencies on AV issues going forward, and urges the department rethink its hands-off approach to safety and the livelihood of millions of workers in its next guidance documents.

Sincerely,

A handwritten signature in black ink that reads "Larry I. Willis". The signature is written in a cursive, flowing style.

Larry I. Willis
President