



# Commercial Vehicle Safety Alliance

Improving uniformity in commercial motor vehicle safety and enforcement

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August 26, 2020

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
West Building, Ground Floor  
Room W12-140  
Washington, DC 20590

**RE:           Docket Number: NHTSA-2020-0070**  
***Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative***

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments regarding docket number NHTSA-2020-0070, related to the collection of information on automated driving systems (ADS) testing, particularly as it relates to commercial motor vehicles.

CVSA is a nonprofit association comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to achieve uniformity, compatibility and reciprocity of commercial motor vehicle inspections and enforcement by certified inspectors dedicated to driver and vehicle safety. Our mission is to improve uniformity in commercial motor vehicle safety and enforcement throughout the United States, Canada and Mexico by providing guidance and education to enforcement, industry and policy makers.

CVSA commends the National Highway Traffic Safety Administration (NHTSA) for continuing its efforts to better understand the state of research, development and on-road testing of ADS. As the lead organization supporting commercial motor vehicle safety enforcement agencies throughout North America, the Alliance wishes to highlight the importance of seeking information about ADS testing in commercial motor vehicles. While commercial motor vehicles represent a fraction of the total vehicle population, many ADS developers are announcing publicly that this operational design domain of long haul, over the road operations is attractive to commercial implementation of ADS, given the economic incentives of freight transport (e.g., trucks may be able to operate with fewer stopped rest breaks for drivers, or non-stop with no drivers at all) when compared to private car ownership, where the economic appeal to individual owners is less clear. CVSA has noted in prior comments to the agency on ADS the importance of understanding the impacts of ADS on how the law enforcement community conducts its work and the need for clear, harmonized and enforceable standards. We look forward to the results of NHTSA's efforts in this area.

CVSA defers to the ADS developers and the users of their technology to respond to questions about who the developers are and where they are testing, but we support the compilation of this information on a national level. CVSA also defers to our member jurisdictions to comment on the burden of reporting state and local laws, regulations, and policies. We recognize that this information is changing rapidly, working directly with state and local agencies to acquire this information is necessary to ensure that it is up to date.

The Alliance works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions.

If you have further questions or comments, please do not hesitate to contact me by phone at 301-830-6149 or by email at [collinm@cvsa.org](mailto:collinm@cvsa.org).

Respectfully,

A handwritten signature in black ink, appearing to read 'Collin B. Mooney'.

Collin B. Mooney, MPA, CAE  
Executive Director  
Commercial Vehicle Safety Alliance