



Owner-Operator Independent Drivers Association

National Headquarters: 1 NW OOIDA Drive, Grain Valley, MO 64029

Tel: (816) 229-5791 Fax: (816) 427-4468

Washington Office: 1100 New Jersey Ave. SE, Washington, DC 20003

Tel: (202) 347-2007 Fax: (202) 347-2008

June 5, 2023

The Honorable Chou-Lin Chen
Associate Administrator, National Center for Statistics and Analysis
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # NHTSA-2023-0015, "Agency Information Collection Activities; Proposals, Submissions, and Approvals: Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative"

Dear Associate Administrator Chen,

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 150,000 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.

Despite the various claims that autonomous vehicles (AVs) will lead to zero deaths, there continue to be real-world situations in which automation has devastatingly failed. Regardless of their potential, it is important to understand the implications of AVs on public roadways. While AVs might improve safety under certain conditions, they create new risks with dangerous outcomes. NHTSA must develop AV standards that are based on documented research and testing data. OOIDA supports the objectives of the AV TEST Initiative, most importantly to provide the public with direct and easy access to information about AV testing and development, along with information from states regarding activity, legislation, regulations, and local involvement in automation on our roadways. However, the AV TEST Initiative's voluntary structure prevents the program from best accomplishing these goals.

NHTSA's 2021 General Standing Order that now requires companies to report crashes on public roadways covered 108 different AV manufacturers and operators. Currently, only 38 total entities (developers, manufacturers, state/local governments, federal agencies, site operators, trade associations, universities, or vehicle operators) are listed on the AV TEST Initiative. Only 19 of these particular groups have submitted any sort of information to NHTSA through AV TEST. Some of this information includes voluntary safety self-assessments or public relations

materials rather than actual safety performance data. Furthermore, the program includes just 19 participating states. This shows the voluntary nature of AV TEST has not been effective in producing the necessary safety data to implement informed regulatory policies for autonomous vehicles.

Moving forward, NHTSA must require mandatory data transparency from manufacturers. This will help educate consumers, the industry, and regulators about the actual reliability and performance of autonomous technology. The reliance on voluntary safety reporting from AV manufacturers will not effectively build public trust, acceptance, and confidence in the testing and deployment of these vehicles and will make it difficult for the agency to properly modify safety regulations.

Thank you,

A handwritten signature in black ink, appearing to read "Todd Spencer". The signature is fluid and cursive, with a prominent loop at the end.

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