

Comment from Paul McEachern

Posted by the **National Highway Traffic Safety Administration** on Aug 9, 2023

It's pretty clear that with this rule as written FMCSA and NHTSA are following the same playbook of actually making the heavy duty trucks and trailers on our roads less safe. The antiquated pneumatic brake controls currently allowed under federal regulations do not respond fast enough to support AEB. In order to comply with the law as written FMCSA and NHTSA are going to have to mandate tractor and trailer electronic brake signaling (EBS) in conjunction with AEB. That is also what needs to be done to actually make the roads safer. Page after page of comments from drivers that heavy truck AEB false activates and it's because the heavy truck AEB has to be calibrated for a slow to respond pneumatically signaled brake system. I also fault FMCSA and NHTSA for not mandating tire pressure monitoring systems while allowing 5 axle 18 wheel truck/trailer combinations to become 5 axle 10 wheel truck/trailer combinations with the significantly reduce safety margin as it relates to tire failures. This is my example of FMCSA and NHTSA actually allowing the roads to become less safe. FMCSA and NHTSA can also be held to be at fault when a majority of the world outside of North America mandate 360 degree override/underride protection on heavy duty trucks and trailers starting more than a half century ago while the heavy truck underride/override slaughter continues in the USA. If FMCSA and NHTSA try to move forward with this trash AEB rule without a truck/trailer EBS mandate I expect your lawyers will be in court over it because it's clearly going to make the roads less safe. Newton's first law isn't going to change...