November 5, 2018

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-2018-0150, "Scope of the Study on the Impact of Automated Vehicle Technologies on Workforce"**

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. OOIDA supports the Department of Transportation (DOT), in consultation with the Department of Labor and in coordination with the Departments of Commerce and Health and Human Services, to provide a comprehensive analysis of the impacts that AV technologies might have on drivers and operators of CMVs.

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 DOT develops the framework for automation in the surface transportation system, the Department must also consider unforeseen concerns and practices that might offset the potential safety, mobility, and sustainability benefits from AVs. Some issues to consider include the impacts on the driver workforce, the consequences for small trucking businesses, and cybersecurity risks.

We believe a federal study analyzing the impact autonomous vehicles might have on the millions of jobs in the trucking industry is necessary. OOIDA also believes the statement of work outlined by DOT is in line with the public interest. DOT Secretary Elaine Chao has recognized that the

introduction of AVs presents a challenge to the 3.9 million drivers currently holding a commercial driver's license. Given the fact that commercial drivers deliver 70 percent of all freight worth $11.7 trillion[1] annually while collecting $700.1 billion in gross revenue,[2] the DOT study will be helpful to determine exactly what challenges the introduction of AVs might have on the millions of people currently working in the trucking industry.

The study must contemplate the potential displacement of jobs, expected changes to the skills and training necessary for drivers to safely operate autonomous trucks, and how these changes would affect driver compensation. OOIDA also recommends that the study specifically examine the impact AVs would have on small trucking businesses, which account for 94% of all U.S. motor carriers. The study must evaluate the costs associated with the introduction of various technologies, how these costs would affect the price of new and used trucks, and how price changes would impact the ability of a small business to purchase new vehicles.

DOT should also expand the scope of the study listed under component 3, "Technological Operational Safety Issues." While the current questions presented are important, especially risks associated with passive fatigue and potential safety issues with platooning, the report should also examine potential cybersecurity vulnerabilities. As more technology is integrated into CMVs and their autonomy increases, the likelihood of cyberattacks might escalate. In 2017, the Transportation Security Administration (TSA) released a report entitled "Vehicle Ramming Attacks: Threat landscape, Indicators, and Countermeasures." The report detailed that terrorist networks have utilized CMVs to carry out attacks in recent years. Since AVs would likely increase the risk of cyber threats to CMV drivers and the general public, the DOT study should include cybersecurity in their analysis of "Technological Operational Safety Issues."

In completing the study, OOIDA suggests that DOT and DOL review the following literature and/or studies:

- OOIDA has met with the Government Accountability Office (GAO) which is conducting a review of the potential impacts of automated trucking on the workforce. This review was requested by Senators Susan Collins and Jack Reed, Chair and Ranking Member of the Committee on Appropriations Subcommittee on Transportation, Housing and Urban Development and Related Agencies. DOT/DOL should coordinate with GAO to understand their review and findings.

- The OOIDA Foundation, *The Challenges of Automated Vehicles in the Trucking Industry* (attached).
  - This report examines various concerns within the trucking industry regarding the deployment of AVs and addresses what questions must be answered by regulators and lawmakers as the technology develops.

- Steve Viscelli, *Driverless? Autonomous Trucks and the Future of the American Trucker*

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[1] Bureau of Transportation Statistics, *Transportation Statistics Annual Report 2016*, Department of Transportation (2016) pg. 58

[2] *American Trucking Trends 2018*, American Trucking Association, https://www.trucking.org/article/New-Report-Finds-Trucking-Industry-Revenues-Topped-$700-Billion

- o A September 2018 report from the UC Berkeley Center for Labor Research and Education that forecasts multiple scenarios for how self-driving trucks could actually be adopted. The report can be found at http://driverlessreport.org.

- National Academies of Sciences, Engineering, and Medicine, *Implications of Connected and Automated Driving Systems, Vol. 1: Legal Landscape*
  - o This 2018 report explores federal, state, and international legal activities and practices regarding connected and automated vehicles and highly automated vehicles. A copy of the report can be accessed at https://www.nap.edu/catalog/25296/implications-of-connected-and-automated-driving-systems-vol-1-legal-landscape.

As AV development continues, 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. Accordingly, we support DOT's efforts to learn more about how AVs might impact the CMV workforce. Additionally, OOIDA would appreciate the opportunity to participate in the study as part of any stakeholder outreach, especially questions and research related to small-business trucking.

Thank you for your consideration of our comments. Please contact me directly at (816) 229-5791 should you have any questions or require additional information.

Sincerely,

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