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February 17, 2020

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Ave., SE, West Building
Room W12-140
Washington, D.C. 20590-0001

RE: Docket No. FMCSA-2018-0328

Dear Sir or Madam:

Lytx, Inc. ("Lytx") supports the establishment of a Beyond Compliance Program and appreciates the opportunity to provide comments on the information collection request ("ICR") proposal. Lytx urges the FMCSA to include the technology supplier community in its assessment of the effectiveness of various technologies and programs in improving motor carrier safety performance. Ultimately, the FMCSA can enhance the quality, usefulness and clarity of the collected information by engaging directly with the supplier community who can share information and data on the safety impact of their products and services.

By way of background, Lytx is a leading provider of video-based safety solutions that is currently used in thousands of commercial fleets. Our technology consists of an intelligent onboard monitoring device that utilizes advanced machine vision and artificial intelligence ("MV+AI") to capture video and data as well as provide in-cab alerts to drivers of risky driving behaviors such as forward collision warnings, following distance warnings, lane departure warnings along with detection of stop signs and use of cell phones, seat belts, food and drink, smoking, etc. In addition to in-cab alerts, the video and data captured is analyzed by Lytx and utilized by our clients for driver training, coaching and improvement.

Lytx's contributions to commercial motor vehicle safety have long been recognized by the FMCSA as the use of video onboard monitoring systems has been proven to have a significant positive impact on operator safety. An FMCSA sponsored study conducted by Virginia Tech Transportation Institute ("VTTI") found that risky driving incidents were reduced by 37% and 52%

respectively for two commercial vehicle fleets that utilized the Lytx DriveCam Program.[1]

A follow-up VTTI study concluded that:

> Trucks and buses equipped with the DriveCam Program had the potential to ***reduce an average of 727 fatal truck and bus crashes*** (20.5 percent of the total fatal crashes) ***and save 801 lives*** (20.0 percent of the total fatalities) each year. Similar results were found for the analysis of injury crashes. Specifically, trucks and buses equipped with the DriveCam Program had the potential to ***reduce an average of 25,007 truck and bus injury crashes*** (35.2 percent of the total injury crashes) ***and save 29,066 injuries*** (35.5 percent of the total injuries) ***each year***.[2]

A more recent study by the AAA Foundation for Traffic Safety found that video-based onboard safety monitoring systems can prevent as many as ***63,000 crashes, 17,733 injuries and 293 deaths each year***.[3]

Further, the National Transportation Safety Board ("NTSB") included on-board video monitoring and recording systems as part of its "2017-2018 Top Ten Most Wanted List of Transportation Improvements Safety Improvements" as such systems not only assist with collision investigations, but "improve the operational and safety oversight" of fleets.[4]

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[1] Hickman, Hanowski, et al. (2009). *Evaluation of an Onboard Safety Monitoring Device in Commercial Vehicle Operations*, Virginia Tech Transportation Institute and Federal Motor Carrier Safety Administration. http://drivingassessment.uiowa.edu/DA2009/006_HickmanHanowski.pdf. Lytx clients on average experience a 50-80% reduction in risky driving incidents.

[2] Hickman & Soccolich (2014). *Potential Reduction in Large Truck and Bus Traffic Fatalities and Injuries Using Lytx's DriveCam Program*, Virginia Tech Transportation Institute. May 2014. p. vi. http://www.trucking.org/ATA%20Docs/What%20We%20Do/Image%20and%20Outreach%20Programs/STR/Lives%20Saved%20VTTI%20Final%20report.pdf

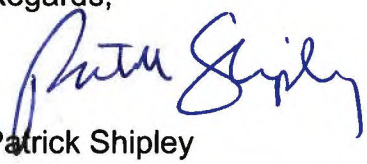
[3] Camden, Medina-Flintsch, et al. (2017). *Leveraging Large-Truck Technology and Engineering to Realize Safety Gains: Video-Based Onboard Safety Monitoring Systems* https://aaafoundation.org/wp-content/uploads/2017/11/Truck-Safety_Video-Systems.pdf; see also http://www.ttnews.com/articles/aaa-study-onboard-safety-systems-could-prevent-63000-large-truck-crashes.

[4] https://ntsb.gov/safety/mwl/Documents/2017-18/2017MWL-FctSht-Recorders-H.pdf

This type of research and analysis from independent parties as well as validated data from technology suppliers should be included in the FMCSA's assessment of technologies to qualify as part of a Beyond Compliance Program. The current ICR proposal unnecessarily limits the participation and data sources to a "select group" of high-performing carriers. This may preclude FMCSA's evaluation of effective safety technologies, particularly newer, innovative technologies.

In sum, Lytx fully supports the efforts in developing a Beyond Compliance Program and encourages the FMCSA to incorporate the technology supplier community in its collection of data on effective safety technologies and programs. The inclusion of this additional data source will provide a more robust data set for FMCSA's analysis. Lytx looks forward to continuing to work with the FMCSA in the development of this Program.

Regards,



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