



Deputy Administrator Hutcheson  
Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue SE  
Washington, D.C. 20003

June 17, 2022

**Samsara Inc. Comment to FMCSA's Information Collection Request: Safe Driver Apprenticeship Pilot Program, Docket No. FMCSA-2022-0081**

Dear Deputy Administrator Hutcheson:

Samsara Inc. ("Samsara") submits this comment in response to the Federal Motor Safety Carrier Administration's ("FMCSA") information collection request relating to the Safe Driver Apprenticeship Pilot Program ("SDAP" or the "Program"). While Samsara supports the Program's vehicle safety technology requirements generally, we believe the SDAP's safety and data collection goals necessitate that these requirements go further in terms of the required video event capture systems. Specifically, the Program should require that carrier participants ensure apprentice drivers only operate vehicles equipped with dual-facing video event capture systems connected to both the internet and a telematics device. Such systems have greater safety benefits, better enable coaching for young drivers, and better capture driver performance data for use by drivers, fleet administrators, and FMCSA than forward-facing camera systems alone.

The current information collection notice indicates that carriers will be required to submit additional information including: *"safety event data (as recorded by all safety systems installed on vehicles, to include advanced driver assistance systems, automatic emergency braking systems, onboard monitoring systems, and forward-facing and in-cab video systems) as well as exposure data (record of duty status logs, on-duty time, driving time, and time spent away from home terminal)."* We believe this data is a critical component of the information collection process, and carriers should be required to have ADAS systems that can collect and report this level of information as a condition for participating in the program.

Research shows that dual-facing, internet connected video telematics devices can reduce crashes and safety risks. These solutions can proactively warn drivers and fleet managers in real-time of unsafe driving behaviors and risks, such as distracted driving (e.g., cell phone usage and driver fatigue), tailgating, and harsh braking, turning, or accelerating. The real-time proactive safety benefits of these solutions help prevent crashes and incidents before they occur, rather than simply documenting it after the fact. This technology is also effective for driver coaching. This use case is especially relevant to the Program, as driver training will be key to ensuring safety for young drivers learning how to operate commercial motor vehicles for the first time. Effective coaching will be instrumental in helping these young apprentices become safe, successful, professional drivers.

The benefits of dual-facing video telematics systems are well illustrated by the success Samsara customers have seen from utilizing this technology across their fleets. To give a few examples:

- ❖ One Illinois-based Samsara customer with a fleet of approximately 550 vehicles operating across 14 states achieved an 88% decrease in harsh events (harsh braking, accelerating, turning, and more) within one year of implementing dual-facing video telematics solutions fleetwide. This technology gives the customer driving data and associated footage to be able to coach drivers proactively. This data helps the customer's team understand each harsh driving event and gauge the type of coaching an employee should receive to improve their performance and help them succeed.
- ❖ Another Samsara customer employing 400 drivers operating across the contiguous 48 United States and Canada, uses footage from dual-facing video based telematics devices to form the basis of its fleet safety program. This customer cites video footage as the single most effective tool with driver training, as it allows for personalized coaching, helps management stay informed, and helps drivers make better decisions while on the road. After deploying dual-facing video telematics systems across its fleet, this organization reduced speeding events by 66%, decreased driver cell phone use by 34%, increased seat belt use by 50%, and reduced tailgating events by 50%. Overall, the organization was able to reduce accidents by 30%, helping keep drivers safer and on the road.
- ❖ A Samsara fleet customer with thousands of drivers and vehicles, operating both long-haul and final mile delivery routes, has made dual-facing video telematics solutions a centerpiece of its driver coaching and safe driving incentive program. The customer attributes footage-based driver coaching to helping it realize a 13% reduction in avoidable accidents. This organization also regularly relies on video event footage to exonerate drivers from false claims, which in turn helps drivers support the use of this technology.

In addition to their safety benefits, dual-facing video telematics technologies collect robust data on driver performance and incidents. These capabilities would enable FMCSA to collect the type of data it needs to fully assess the overall safety of program participants and inform federal policy changes. Without data collected by a dual-facing video event capture system, it will be impossible for FMCSA to determine if the young apprentice drivers pose additional safety behavioral risks like cell phone usage, failure to wear a seat belt, or fatigued driving. Ultimately, without comprehensive data about the behavior of younger drivers, it will be difficult to determine the long term potential safety impacts of allowing them to operate commercial vehicles.

In all, video event recording systems that deliver proactive, actionable safety benefits are critical to ensuring the Pilot Program has an equivalent or greater level of safety to existing requirements. Accordingly, we ask that in selecting carriers to participate in the Pilot Program, FMCSA select only carriers committed to having their 18 to 20 year old drivers operate vehicles equipped with dual-facing, internet connected video telematics solutions. At minimum, FMCSA should prioritize such carriers over those not utilizing these advanced safety systems.

If FMCSA declines to limit its selection to carriers utilizing dual-facing video telematics solutions, the agency should at minimum require that forward-facing video event recording systems be connected to the internet and a telematics device. Without these conditions, the program's video event recording requirement will fail to have a meaningful safety impact and will not give FMCSA the data it needs to make informed decisions about the Pilot Program.

Samsara believes the trucking industry has tremendous potential to use advanced vehicle technology to enhance safety, and we support the agency's efforts to encourage safety innovation and data driven decision making. We appreciate your time and attention to this matter. We thank you again for your work to prioritize safety in the motor carrier industry.

Sincerely,

Samsara Inc.

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