



November 21, 2022

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Federal Motor Carrier Safety Administration (FMCSA)

Dockets Operations

U.S. Department of Transportation

West Building, Ground Floor, Room W12-140

1200 New Jersey Avenue S.E.

Washington, DC 20590

Re: Agency Information Collection Activities; New
Information Collection: Human Factors Considerations in
Commercial Motor Vehicle (CMV) Automated Driving
Systems (ADS); Doc. No. FMCSA-2022-0163.

Ladies and Gentlemen:

The American Truck Dealers division of the National Automobile Dealers Association (ATD) represents over 1,700 franchised CMV dealers who sell new and used medium- and heavy-duty trucks, tractors, and trailers, and engage in service, repair, and parts sales. Together they employ in excess of 125,000 people nationwide, yet most are small businesses as defined by the Small Business Administration.

In September 2022, FMCSA requested comment on an Office of Management and Budget (OMB) review of a new information collection request (ICR) for a driving simulator study involving a series of questionnaires designed to evaluate how CMV drivers engage in Society of Automotive Engineers (SAE) Level 2 (L2) and Level 3 (L3) ADS-equipped CMVs.¹ The study will also involve the development and testing of a CMV driver distraction training program designed to improve driver readiness.² It will be conducted over two sessions and will “collect data on the effects of non-driving secondary tasks and readiness to resume control of an L2- or L3-equipped CMV[,]” and the “effectiveness of driver training to improve safety while operating an L2 or L3 CMV.”³ The findings of the study “will inform training materials to educate drivers on distraction and the functionality of ADS as well as policy pertaining to the implications of ADSs in CMVs.”⁴

ATD members are very engaged in helping to educate CMV purchasers on the high-tech systems on-board new, and newer used, trucks and tractors in order that they understand and

¹ 87 Fed. Reg. 57750, *et seq.* (Sept. 21, 2022).

² 87 Fed. Reg. at 57751.

³ *Id.*

⁴ *Id.*

benefit from those systems. Such systems include the L2 and L3 active safety systems increasing found on new CMVs that are the subject of the ICR.

ATD supports FMCSA's proposed study and its efforts to gain insight into driver engagement with ADS-equipped CMVs. Driver engagement is integral to lower-level ADS systems, like L2 and L3. With these semi-automated systems, drivers must maintain situational awareness of the driving environment, understand the limitations of the ADS system, and always be prepared to assume vehicle control. Although real-world operation of ADS-equipped CMVs is in its nascency, the limited existing research on this topic indicates that drivers are at risk of becoming distracted by non-driving tasks, and of being disengaged from the driving task during automated driving phases.⁵ FMCSA notes a lack of research regarding the operation of ADS-equipped CMVs and states that, if the ICR is approved, it will obtain new data on real-world driver behavior that can be used to inform related policies.⁶ As deployment of ADS-equipped CMVs in real-world operations increase, the need to educate and train CMV drivers on the critical importance of driver engagement and driver readiness will also increase. Consequently, ATD fully supports the FMCSR study, and this related ICR.

On behalf of ATD, I thank FMCSA and OMB for the opportunity to comment on this matter.

Respectfully submitted,

A handwritten signature in cursive script, reading "Douglas I. Greenhaus".

Douglas I. Greenhaus
V.P., Regulatory Affairs,
Environment, Health and Safety

⁵ See Banks, Victoria & Eriksson, Alexander & O'Donoghue, Jim & Stanton, Neville, *Is Partially Automated Driving a Bad Idea? Observations From an On-Road Study*, Applied Ergonomics 68:138-45 (Apr. 2018).

⁶ 87 Fed. Reg. at 57751.