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My comment is regarding the efficiency of the data collection.

There is no information provided as to how these tests will be conducted in terms of longevity or operation. There is a lot more that goes into truck driving than staying on the road. One of these important factors is being able to focus for long periods of time over days of continuous driving. Driver fatigue is a major cause of trucking accidents and is present even when a driver is sufficiently rested. [https://www.safety.af.mil/Portals/71/documents/Occupational/Resources/DSOC%20Modules/09\\_Distractions\\_and\\_Fatigue\\_07-12%20\(Rcv\).pdf](https://www.safety.af.mil/Portals/71/documents/Occupational/Resources/DSOC%20Modules/09_Distractions_and_Fatigue_07-12%20(Rcv).pdf) There is also an increase of risk taking with comfortability in driving. It would make more sense to test drivers that have already switch to this technology and used it for over a multiple day or week period. Eye tracking would be a form of technology that could be used (similar to how eye tracking is used over computerized standardized tests).

Additionally, there is not a big enough sample size to account for the study to be an effective study for National purposes. There are more than 3.5 million truck drivers in the U.S. These drivers are much more likely to have a disability, and to be aged 55 or older. Whereas incoming younger truckers are more likely to be Hispanic and potentially female (though still largely outnumbered by males). These groups have significant factors differentiating them and it is not clear whether the "demographic testing" is taking this into consideration. Regardless, there is estimated to be only 100 drivers participating in this test. These 100 drivers are divided into two groups: 50 drivers will test L-2 while another 50 test L-3.

"An L2 vehicle offers longitudinal and lateral support to the driver; however, the driver is still responsible for driving at all times. At this level, engaging in non-driving secondary tasks can be highly detrimental to driving performance as the driver may not recognize and respond to hazards timely or appropriately. In an L3 vehicle, the role of distraction is blurred. The driver takes on a more supervisory role and is in full control of the vehicle in a limited number of situations. When an L3 vehicle alerts the driver that a takeover is required, the driver needs to have situational awareness to resume full control of the vehicle."

These are two very different tests with exercising different skill sets. Thus we are really only getting information on 50 people for each version of the test. It would make more sense to either conduct a test with a smaller sample-size over a multiple day study to get more accurate results, or to spend more time creating a more comprehensive testing method which may be replicated more cost effectively for a larger sample size. These studies are important to do quickly considering the rapid change of technology. However, it is important to studies that have enough validity to be worth the effort and cost.