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Via Electronic Submission

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As Automated Driving Systems (ADS) become more advanced and more prevalent in commercial motor vehicles, the interaction of human drivers with Automated Driving System (ADS)-equipped trucks will become an increasingly important factor in highway safety.

The American Property Casualty Insurance Association (APCIA) supports FMCSA's research into the interactions between drivers/remote operators and commercial vehicles using ADS. Our association's more than 1,200 member companies insure both trucks and the personal vehicles that share the road with them. APCIA member insurers provide 74 percent of all commercial auto insurance in the United States, along with 53 percent of private passenger auto insurance. This gives APCIA a unique perspective on auto and highway safety issues.

Quantifying both the positive and negative safety impacts of the four human-ADS teaming scenarios outlined in FMCSA's Request for Comments will help predict how increased ADS use will change driver workload, fatigue, alertness, etc. The research may reveal additional human-ADS teaming scenarios and/or indicate circumstances under which changes to driver hours of service might make sense. We will leave the technical requirements for successful research into human-ADS teaming to those with expertise in driving workloads and ADS systems. The important point here is to quickly move forward to quantify appropriate driver workloads, as the technology is advancing faster than understanding of its highway safety impact.

APCIA would like to take this opportunity to remind the agency, as we stated in 2018, that insurers' abilities to identify vehicles with automated driving technology, as well as differentiate among various system providers and system functions, will be critical for development of new insurance products, underwriting, and pricing methods as automated vehicle technology evolves. FMCSA should take this opportunity to address Automated Driving System information access, both during testing and after full implementation.

Automated vehicle technology brings opportunities for insurers to innovate and develop new insurance products that support the use of automated vehicles. Right now, auto insurance pricing is largely based on the driver. Going forward, assessing the risk may become focused as much on the systems driving the vehicles as on the human drivers. Appropriate information sharing is also critical for insurers to fulfill their dual roles in improving safety and resolving highway accidents.

Automated Driving Systems hold the promise of many innovations to come for vehicles, the motor carrier industry, and the insurance coverage that protects them all. APCIA supports innovation and recognizes that information flow to appropriate parties, including insurers, will be critical to improved safety on our highways. Our association looks forward to working with FMCSA and other stakeholders to make the promise of safer highways through vehicle automation come true.

Sincerely,



Robert Passmore