



Associate Administrator Thomas Keane
Office of Research and Registration
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

July 27, 2023

Re: Docket Number FMCSA-2023-0098, “New Information Collection: Safety Impacts of Human-Automated Driving System (ADS) Team Driving Applications”

Dear Associate Administrator Keane,

The Autonomous Vehicle Industry Association (“AVIA”) writes in response to the Federal Motor Carrier Safety Administration’s (“FMCSA”) Request for Comments (“RFC”) on the Safety Impacts of Human-Automated Driving System (ADS) Team Driving Applications. The RFC requests feedback on an information collection that will include a driving simulator study on the safety implications of team driving applications between humans and automated driving system- (“ADS”) equipped vehicles. AVIA supports FMCSA’s efforts to safely integrate ADS-equipped CMVs into interstate motor carriers’ operations and appreciates the opportunity to provide comment on this information collection.

AVIA is comprised of the world’s leading technology, trucking, ridesharing, automotive, and transportation companies. Our mission is to bring the tremendous safety and mobility benefits of autonomous vehicles (“AVs”)—otherwise known as SAE Levels 4- and 5-capable vehicles—to consumers and businesses in a safe, responsible, and expeditious manner.

AVIA appreciates FMCSA’s continued leadership on developing a thoughtful framework for ADS-equipped CMVs, informed by studies like the one proposed in this information collection. We believe that the findings of the proposed study will provide further support, in alignment with AVIA’s advocacy, for amending certain FMCSA regulations to clarify inapplicability of provisions to Level 4 or 5 ADS-equipped CMVs, including Hours of Service limitations.

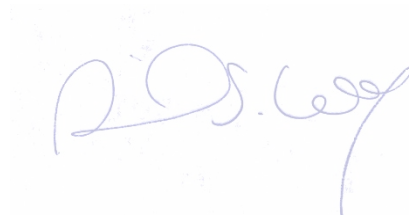
Upon review of the RFC, AVIA would like to highlight one issue for FMCSA’s attention - the need for consistency in terminology when discussing ADS-equipped CMVs and autonomous vehicle (“AVs”) technologies overall. Because the industry is a diverse and growing field, consistency in AV-related terminology is vital to ensure uniformity in how topics are discussed and addressed among industry and regulators. In this regard, AVIA would recommend that FMCSA amend language in the information collection to reflect the terminology used in SAE J3016.¹ Specifically, to bring the information collection in line with J3016 the term “remote monitor” should be replaced with “remote assistant,” while the term “remote operator” should be

¹ *Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles - J2016_202104*, SAE International 3.23-3.24.

replaced with “remote driver.” AVIA has previously recommended that FMCSA utilize these terms from SAE J3016 in our comments on the recent Supplemental Advance Notice of Proposed Rulemaking (“SANPRM”) on the Safe Integration of Automated Driving Systems (ADS)-Equipped Commercial Motor Vehicles (CMVs) (“the SANPRM”).² Bringing both this information collection and the SANPRM into alignment with J3016 will provide added consistency across FMCSA materials and allow the information collection’s findings to be more easily analyzed in line with the proposed rules discussed in the SANPRM.

AVIA is grateful for the continued opportunity to work with FMCSA to develop a thoughtful approach to the safe integration of Level 4 and 5 ADS-equipped CMVs into interstate operation. Establishing consistent and shared terminology is an important step in that process, and we stand ready to engage with FMCSA to further discuss the proposed information collection and the wider development of appropriate regulatory solutions that will allow the public to reap the benefits of autonomous trucking in the safest and swiftest manner possible. If there is anything further we can do to assist you or your staff on these or related matters, please do not hesitate to reach out.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ariel S. Wolf", with a stylized flourish at the end.

Ariel S. Wolf
General Counsel
Autonomous Vehicle Industry Association

² See Safe Integration of Automated Driving Systems (ADS)-Equipped Commercial Motor Vehicles (CMVs), 88 Fed. Reg. 6691 (Feb. 1, 2023).