



Sophie Shulman
Deputy Administrator Performing the Duties of the Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, D.C. 20003

June 5, 2024

**Samsara Inc. Comment to NHTSA's Information Collection Request (ICR): Examining
Distraction and Driver Monitoring Systems To Improve Driver Safety, Docket No.
NHTSA-2023-0026**

Dear Acting Administrator Shulman:

Samsara Inc. ("Samsara") submits this comment in response to the National Highway Traffic Safety Administration's ("NHTSA") information collection request relating to the Examining Distraction and Driver Monitoring Systems To Improve Driver Safety. Samsara shares NHTSA's goal of improving safety and reducing crashes on our nation's roadways. In recent years, there have been important advances in vehicle safety technologies with the potential to significantly reduce the number of crashes involving commercial motor vehicles if widely adopted. As NHTSA conducts this important study, partially responding to Section 24209 of the Infrastructure Investment and Jobs Act (IIJA), we encourage the agency to consider not just the efficacy of driver monitoring systems (DMS) in production vehicles, but also the efficacy and safety benefits of aftermarket DMS, especially those deployed in commercial motor vehicles. Deployment of aftermarket safety technology has proven to reduce the frequency and severity of crashes, and NHTSA's study into the benefits of DMS' ability to detect driver distraction should not be limited to light duty, personally owned vehicles using built-in systems.

Large trucks and buses accounted for 13.5 percent of all fatal crashes in 2021 and 8.7 percent of all non-fatal crashes¹. Large trucks and buses have also tracked a similar trend line as the overall roadway fatality statistics, with a 34 percent decrease in the number of fatal crashes involving large trucks or buses between 2005 and 2009, followed by a sharp increase of 52 percent

¹ <https://www.fmcsa.dot.gov/safety/data-and-statistics/large-truck-and-bus-crash-facts-2021>

between 2010 and 2021, according to the FMCSA Large Truck and Bus Crash Facts 2021 report². This increase in fatalities post 2009 can likely be attributed in part to the increase in driver distractions, including those caused by the proliferation of smartphones.

Limiting a study to production DMS could leave out the impacts of aftermarket commercial vehicle DMS that could potentially immediately improve the safe operation of the nearly 13.8 million single-unit trucks and tractor trailers on the road today³. Given that the commercial motor vehicle market has a longer fleet turnover time than personally owned light duty vehicles, aftermarket solutions are all the more critical to addressing driver distraction in the near- and medium-term.

Samsara's AI powered dual-facing dash cameras are one example of aftermarket DMS safety technology that has demonstrated on-road safety benefits and improved adoption of safety practices. Research shows that dual-facing, internet connected video telematics devices can reduce crashes and mitigate 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., mobile phone usage, driver inattentiveness, etc.), or other safety events such as harsh braking. In-cab notifications can alert drivers to unsafe behaviors and allow immediate self-correction. The real-time proactive safety benefits of these solutions help prevent crashes and incidents before they occur. This technology is also effective for one-on-one driver coaching and improvements to a motor carrier's overall training program.

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. For instance:

- ❖ 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 critical 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 required to improve 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

² ibid

³<https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/2024-04/FMCSA%20Pocket%20Guide%202023-FINAL%20508%20-%20April%202024.pdf>

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 collisions by 30%, helping keep drivers safe 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 collisions. 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.

The trucking industry has tremendous potential to use advanced vehicle technology to enhance safety. We support NHTSA's efforts to further study, validate, and encourage safety innovation and data-driven decision making. We urge the agency to ensure that the findings and recommendations of this important study are not limited in their scope such that commercial vehicles and aftermarket technologies are excluded. We thank you for your work to prioritize roadway safety.

Sincerely,

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