



August 12, 2024

Mr. Brian Ronk
Office of Outreach and Education
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue S.E.,
Washington, D.C. 20590-0001

Re: FMCSA Information Collection Request: Understanding Attitudes and Behaviors of Safety Belt Use Among Commercial Motor Vehicle Drivers

Dear Mr. Ronk,

On behalf of the American Trucking Associations (ATA), I write in support of the Federal Motor Carrier Safety Administration's (FMCSA) proposal to conduct an online survey of commercial motor vehicle (CMV) drivers to better understand their perceptions and behaviors surrounding seatbelt usage and roadway safety. As the largest national trade association for the trucking industry, ATA values efforts to study and encourage the full spectrum of safety measures to prevent fatal and injury-causing crashes from occurring on our nation's roadways. ATA commends FMCSA's efforts to conduct this proposed survey and its ongoing efforts to support and protect CMV drivers and industry safety by providing education on and promoting seatbelt use.

ATA recognizes that risky driving behaviors, including failing to wear a seatbelt, among CMV drivers pose a major risk to both commercial and passenger traffic safety. Leveraging key safety initiatives like ATA's Share the Road program and through partnerships with FMCSA and other industry leaders, ATA strongly encourages all CMV drivers to always use their seatbelts properly. Unfortunately, CMV drivers wear seatbelts at a rate lower than the general driver population with around 14 percent of CMV drivers regularly failing to buckle up.¹ This heightens their chances of injury and fatality when a crash occurs as wearing a seatbelt has been shown to reduce a driver's chance of death and serious injury by up to 60%.² The National Highway Traffic Safety Administration's (NHTSA) crash fatality statistics show that nearly 70 percent of drivers, or 635 total, who died in a crash in 2022 were not buckled up.³ Further illustrating the issue, in 2022, failing to wear a seat belt was the fourth most common roadside violation among CMV drivers.⁴ While 70 percent of fatal crashes involving a large truck and a passenger vehicle are initiated by the actions of or are the fault of passenger motorists, according to FMCSA, ATA recognizes the industry's opportunity to take direct action toward reducing serious crashes.⁵ ATA and its members have found driver outreach and education on the realities and benefits of always wearing a seatbelt to be among the most effective mechanisms for addressing this crucial issue.

ATA commends FMCSA's efforts to address current gaps in data around CMV drivers' seatbelt usage to better understand drivers' attitudes and behaviors around buckling up, as well as barriers to doing so. We

¹ "Safety Belt Usage by Commercial Motor Vehicle," Federal Motor Carrier Safety Administration (FMCSA), 2016.

² "Seat belts," NHTSA, <https://www.nhtsa.gov/vehicle-safety/seat-belts>.

³ Fatality Analysis Reporting System (FARS), National Highway Traffic Safety Administration (NHTSA), 2022.

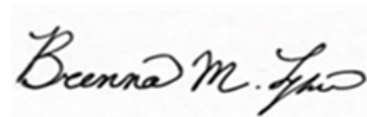
⁴ Pocket Guide to Large Truck and Bus Statistics, FMCSA, 2022.

⁵ Financial Responsibility Requirements for Commercial Motor Vehicles, U.S. Department of Transportation, Federal Motor Carrier Safety Administration, January 2013, page xii, footnote 2.

believe this survey has the potential to be a critical tool in informing and bolstering the Agency's strategies to create greater awareness and encourage seatbelt use and other safe driving behaviors among CMV drivers, thereby enhancing road safety for all. ATA encourages FMCSA to engage industry partners, including motor carriers, driver organizations, and industry associations including ATA, to collaborate in the development and implementation of driver outreach and education informed by this survey. ATA recommends that FMCSA look to its TechCelerate Now program, which successfully brought together diverse industry stakeholders to cooperatively advocate for the use of advanced safety technologies, as a model for conducting this survey and successfully deploying strategies to increase seatbelt use among CMV drivers. The TechCelerate Now program's success was reflected in its grounding in quality research that called upon a substantial pool of participants reflective of the CMV driver community. This was largely due to the program's strong strategic communication of research objectives and trust-building with drivers to encourage their ongoing participation and engagement. ATA therefore recommends mirroring these participant recruitment and communication strategies for this proposed study, ensuring that FMCSA effectively communicates with potential participants that findings will not be used to advance regulations or policy but rather to better understand the issue of seatbelt use.

We appreciate FMCSA's commitment to the safety of the CMV industry, CMV drivers, and all roadway users and look forward to our continued collaboration. Please let us know if ATA can assist in the development and dissemination of this survey. Should you have any questions or desire additional information, please do not hesitate to contact me at (703) 838-8804.

Sincerely,

A handwritten signature in black ink, reading "Brenna M. Lyles". The signature is written in a cursive, flowing style.

Brenna Lyles
Director, Safety Policy
American Trucking Associations