

February 11, 2024

*Via Regulations.gov*

Thomas Keane  
Associate Administrator, Office of Research and Registration  
Federal Motor Carrier Safety Administration  
1200 New Jersey Ave SE  
Washington, DC 20590-0001

Re: Agency Information Collection Activities; New Information Collection: Study of Warning Devices for Stopped Commercial Motor Vehicles

Mr. Keane,

The American Trucking Associations (ATA)<sup>1</sup> thanks the Federal Motor Carrier Safety Administration (FMCSA) and the Department of Transportation (DOT) for the opportunity to comment on the information collection request (ICR) regarding the upcoming study of warning devices for stopped vehicles. This research addresses a critical safety issue for industry and is relevant to several prominent crash types that we are working to address. ATA urges the Office of Management and Budget (OMB) to approve the collection without delay so that any key results can be put into practice as quickly as possible.

ATA would also like to note the opportunity that FMCSA has with this study to improve our knowledge of conspicuity and safety. Despite having regulations to deploy warning triangles or flares in the regulations for many years, crashes with stopped or disabled trucks still occur. There are two possibilities which should be considered in light of this. First, it is possible that existing warning triangles or flares are not sufficient for preventing these types of crashes. To address this possibility, FMCSA could use the study to explore alternatives to warning triangles or flares. Fortunately, the design of the study and the number of participants outlined in the ICR provide excellent flexibility for incorporating new technologies into the analysis. Second, it is possible that while warning triangles and flares provide safety benefits, these are mitigated by drivers failing to deploy them correctly. FMCSA should consider that it is inherently dangerous for a driver to exit a stopped vehicle on the side of the highway to deploy warning devices. Alternatives that *are safer and more convenient for the CMV driver* could see improved real-world usage and improved real-world safety benefits for all road users.

This research has the potential to contribute to several areas in which industry is actively trying to improve safety, such as rear-end crashes and work zones. ATA thanks FMCSA for dedicating time and resources to a well-designed study, and encourages OMB to approve the ICR without delay. If you have questions, please contact me at (703) 838-7980, or e-mail [kgrove@trucking.org](mailto:kgrove@trucking.org).

Sincerely,



Kevin Grove  
Director, Safety and Technology Policy

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<sup>1</sup> ATA is a united federation of motor carriers, state trucking associations, and national trucking conferences created to promote and protect the interests of the trucking industry representing more than 30,000 motor carriers directly and through its affiliates.