



March 3, 2021

The Honorable Pete Buttigieg  
Office of the Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Secretary Buttigieg,

As the U.S. Department of Transportation (DOT) works to improve and enhance road safety under your leadership, the American Trucking Associations (ATA) and Road Safe America hope to continue the precedent of collaborating closely with the Federal Motor Carrier Safety Administration (FMCSA) to support the deployment of proven vehicle safety technologies for commercial motor vehicles (CMV). Such efforts foster improved safety on our nation's roads and bridges to the benefit of all road users. In that vein, we are aware that the February 2020 DOT Report on Significant Rulemakings includes a proposal related to heavy vehicle speed limiters and would therefore like to alert you to the trucking industry's progress on speed management since the announcement of the 2016 Notice of Proposed Rulemaking (NPRM).

When DOT initially published the 2016 NPRM, ATA and many motor carriers shared several concerns about the efficacy of a one-size-fits-all solution applied to a sector as complex and nuanced as trucking. Foremost among them were the unintended and potentially dangerous consequences of limiting commercial drivers to one universal speed limit despite the varying limits set for passenger vehicles on interstate and secondary roads. Another question was how such a rule would adapt to the rapid evolution taking place in vehicle safety technology.

Much has changed since 2016. Technological advancements have increasingly enabled motor carriers to adopt proven safety technologies, prompting ATA to support new and safer approaches to speed management. Over the past few years, motor carriers have widely adopted automated emergency braking and adaptive cruise control on most purchased and leased vehicles, and the integration of these devices with speed governing technology is showing enormous promise for transportation safety. Given the rapid development and widespread adoption of this integrated technology and the safety benefits they produce, we believe the issue of speed governing should be addressed with a 21<sup>st</sup> century solution to ensure maximum adaptability.

This consensus has not only driven ATA to adjust its policies, but has also prompted Congress to reconsider its stance on legislation directing CMV speed governance. Introduced in December of 2019, S.3005, the Cullum Owings Large Truck Safe Operating Speed Act proposes a 21<sup>st</sup> century solution to technologically limit and manage CMV speed. The bill promotes incentives to drive adoption and use of newer technologies and provides a mechanism for DOT to continually review and update technology requirements to guard against obsolescence. The bill reflects the

consensus of stakeholders and is supported by ATA and Road Safe America as an appropriate way to mitigate the risk of excess CMV speed on our nation's highways.

We commit to working with you, Congress and all stakeholders to advance a meaningful and thoughtful discussion on the coupling of new technologies with speed governance for commercial motor vehicles to enhance the safety of all road users. As you review proposals related to the speed governance of CMVs, we look forward to working closely with you to pursue the policy recommendations outlined in the Cullum Owings Large Truck Safe Operating Speed Act.

Thank you for your attention and thoughtful consideration of this important and timely matter.

Sincerely,



Chris Spear  
President & CEO  
The American Trucking Associations



Steve Owings  
President & Co-Founder  
Road Safe America

CC: The Honorable Maria Cantwell  
The Honorable Roger Wicker  
The Honorable Peter DeFazio  
The Honorable Sam Graves