Statement of

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Before the

SENATE COMMITTEE ON COMMERCE, SCIENCE

AND TRANSPORTATION

SUBCOMMITTEE ON

SURFACE TRANSPORTATION AND MERCHANT MARINE INFRASTRUCTURE, SAFETY, AND SECURITY

Hearing on Opportunities and Challenges for Improving Truck Safety on our Highways

July 29, 2014

Driving Trucking's Success

Introduction

Chairman Blumenthal, Senator Blunt, members of the Subcommittee, my name is Dave Osiecki, and I am the Chief of National Advocacy for the American Trucking Associations (ATA). ATA is the national trade association for the trucking industry and is a federation of affiliated State trucking associations, conferences, and organizations that together have more than 30,000 motor carrier members representing every type and class of motor carrier in the country. Thank you for the opportunity to testify.

Today, I will speak about the trucking industry's safety record and measures ATA supports to continue the industry's long-term, positive safety trend. I will also talk about a fundamental change in the government's approach to truck safety enforcement that is needed to make further, significant gains in truck safety. To bring about further meaningful improvements will require an acknowledgement of the principle causes of truck crashes and a commitment to making appropriate countermeasures the highest priority.

In addition, I will discuss some of the trucking industry's views on regulatory issues such as hours of service, electronic logging devices, and FMCSA's safety monitoring, measurement, and enforcement prioritization system: *Compliance, Safety, Accountability* (CSA). These issues have been the focus of much attention recently, so it is important to clarify the industry's views on them. Finally, I will discuss some of the many industry–supported safety initiatives, such as the recently proposed drug and alcohol clearinghouse.

The Industry's Safety Commitment and Safety Record[1]

The trucking industry places both driver safety and public highway safety at the top of its priority list each and every day. In fact, the industry has an impressive safety record and is near its safest point in history. For example:

- The truck-involved fatality rate has decreased 74% since 1975, the first year the U.S. Department of Transportation (DOT) began keeping records.[2]
- From 2002 to 2012, the number of truck-involved fatalities fell by 21% and the number of truck-involved injuries fell by 20%.[3]
- From 2002 to 2012, the truck-involved fatality rate per 100 million vehicle miles traveled dropped 37%[4]

[1] 2012 is the most recent year for which such data are available.
[2] *Large Truck and Bus Crash Facts 2012,* Trends chapter, Tables 4, page 7, Federal Motor Carrier Safety Administration, Washington, D.C. http://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Large-Truck-Bus-Crash-Facts-2012.pdf.
[3] *Large Truck and Bus Crash Facts 2012*, Trends chapter, Tables 4 & 7, pages 7 and 13, Federal Motor Carrier Safety Administration, Washington, D.C. http://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Large-Truck-Bus-Crash-Facts-2012.pdf.
[4] *Large Truck and Bus Crash Facts 2012,* Trends chapter, Tables 4, page 7, Federal Motor Carrier Safety Administration, Washington, D.C. http://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Large-Truck-Bus-Crash-Facts-2012.pdf.

- In actual numbers, there were 1,018 fewer fatalities in 2012 than in 2002—very good progress in light of the trucking industry operating 2.7 million additional trucks and 54 billion more miles in 2012 (compared to 2002).[5]
- The truck-involved injury rate has decreased 59% since 1988, the first year USDOT began keeping records.[6]
- Over the past decade alone, the truck-involved injury rate dropped by 31%.[7]

Despite these long-term trends and safety accomplishments, the trucking industry knows it can continue to improve its highway safety performance, and works daily to reduce its share of the larger crash problem on our highways.

Note: *The Federal Highway Administration (FHWA) implemented an enhanced methodology for estimating registered vehicle miles traveled by vehicle type beginning with data from 2007. As a result, involvement rates may differ, and in some cases significantly, from earlier years.*

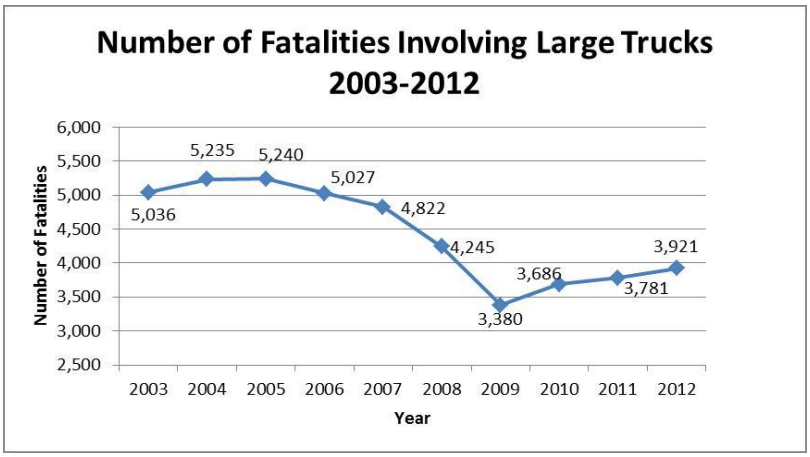
Some May Try to Distort Trucking's Safety Record

Despite the industry's safety accomplishments, industry critics continue to use selective figures in an attempt to paint a far different picture. Sometimes they do so to justify inappropriate or unnecessary policy changes. Here's an example:

Like the stock market, highway safety trends can rarely be depicted with straight lines. There is always some short term variability. Looking at the long term, however, it is clear to see what is taking place. However, industry critics choose a portion of that period, 2009 – 2012 as an example, in an attempt to create a different perception.

As the chart below reflecting truck related fatalities over the last decade shows, focusing on the most recent three years is misleading since the drop in truck related fatalities from 2007 – 2009 was unusually steep (in part due to the economic recession) and since a selective focus on the three years since then ignores the long term safety picture.

[5] Ibid.
[6] *Large Truck and Bus Crash Facts 2012,* Trends chapter, Tables 7, page 13, Federal Motor Carrier Safety Administration, Washington, D.C. http://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Large-Truck-Bus-Crash-Facts-2012.pdf.
[7] Ibid.



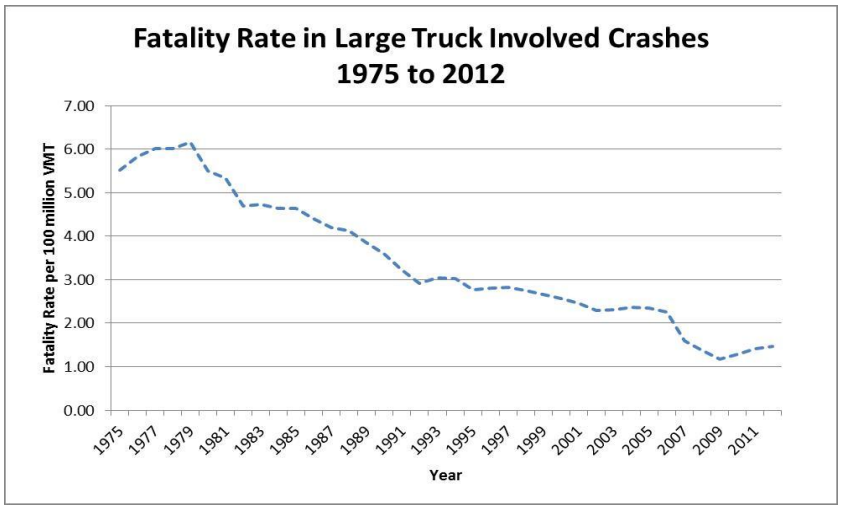
The suggestion that the recent figures point to some sort of truck safety crisis is not only wrong, as demonstrated by the trucking industry's long term safety record, but ignores what the National Highway Traffic Safety Administration has said about these figures:

> *"Note that the number of fatal crashes involving large trucks is relatively small, so such variability in the number of fatalities is not unexpected."*[8]

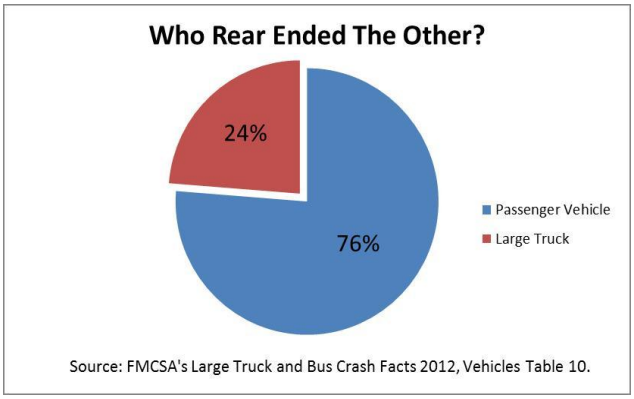
The focus on large truck related fatalities alone ignores the fact that the long term drop in truck-related fatalities has occurred despite the increase in exposure. To accurately measure whether or not roadways are getting "safer" from one year to the next, analysts must put raw crash numbers in the context of some exposure measure, such as miles driven (e.g., crashes per 100 million vehicle miles traveled). This is the generally accepted measure used by highway safety professionals. For example, it would be foolish to contend that trucks operating in Delaware are somehow safer than those operating in California because there are fewer truck crashes in Delaware. There are far more trucks traveling many more miles in California than in Delaware. To make a meaningful comparison, we must compare these states in terms of miles driven.

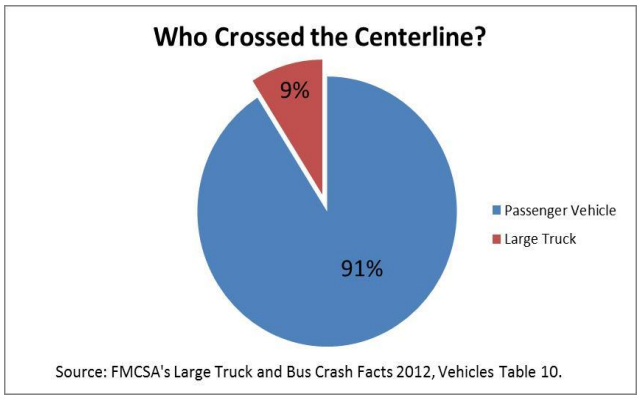
This sort of comparison from year to year on a national level reveals some meaningful and significant observations. Specifically, though the *number* of truck-related fatalities has dropped 21% over the past decade (2002 - 2012), the decline in the large truck fatality *rate* is even steeper. Moreover, from 2002 – 2012 the truck-involved fatality rate per 100 million vehicle miles traveled dropped 37%.[9]

[8] 2012 Motor Vehicle Crashes Overview, National Highway Traffic Safety Administration, Washington, D.C. 2014, http://www-nrd.nhtsa.dot.gov/Pubs/811856.pdf.
[9] *Large Truck and Bus Crash Facts 2012,* Trends chapter, Tables 4, page 7, Federal Motor Carrier Safety Administration, Washington, D.C. http://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Large-Truck-Bus-Crash-Facts-2012.pdf.



Also, according to a recent FMCSA report,[10] consistent with other research on the subject,[11] 70% of fatal crashes involving a large truck and a passenger vehicle are initiated by the actions of passenger vehicle operators. For instance, large trucks are three times more likely to be struck in the rear in two-vehicle fatal crashes.[12] Also, in 91% of fatal head-on collisions between a large truck and a passenger vehicle, the passenger vehicle crossed the median into the truck's lane of travel.[13] Moreover, large trucks have an overall crash rate almost half that of other vehicles.[14]





[10] *Financial Responsibility Requirements for Commercial Motor Vehicles*, See Footnote 2, page xii, Federal Motor Carrier Safety Administration, Washington, D.C., January 2013. http://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Financial-Responsibility-Study.pdf

[11] *Relative Contribution/Fault in Car-Truck Crashes*, American Trucking Associations, Arlington, VA, February, 2013.

[12] *Traffic Safety Facts 2012 Data: Large Trucks,* National Highway Traffic Safety Administration, http://www-nrd.nhtsa.dot.gov/Pubs/811868.pdf

[13] *Large Truck and Bus Crash Facts 2012,* Vehicle chapter, Tables 9, page 60, Federal Motor Carrier Safety Administration, Washington, D.C. http://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Large-Truck-Bus-Crash-Facts-2012.pdf.

[14] *Large Truck and Bus Crash Facts 2012,* Trends chapter, Tables 4, 6, 7 9, 10 11, pages 7-21, Federal Motor Carrier Safety Administration, Washington, D.C. http://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Large-Truck-Bus-Crash-Facts-2012.pdf

Some may also try to distort the long-term truck safety picture by telling Congress and the public that large trucks are over-involved in fatal crashes. Such statements are purposefully misleading. When large truck crashes occur they are generally more severe than light vehicle crashes, due to size and weight differences between large trucks and passenger vehicles. Trucks are not more likely to be involved in a crash, but when such a crash does occur it is slightly more likely to result in a fatality. This is the case not because trucks are less safe, as some would have you believe, but due to simple Newtonian physics.

The long term improvement in truck safety is due, in part, to industry-supported initiatives. For example, ATA was an early advocate of mandatory drug and alcohol testing, the commercial driver's license program, a ban on radar detectors in trucks, and the recently proposed clearinghouse of drug and alcohol test results. The industry continues to promote additional regulatory initiatives that will improve safety, such as the mandatory use of electronic logging devices to track hours of service compliance, the mandatory use of speed limiters on trucks, stability control systems on new trucks, and a national system to alert employers of drivers' moving violations in a timely fashion.

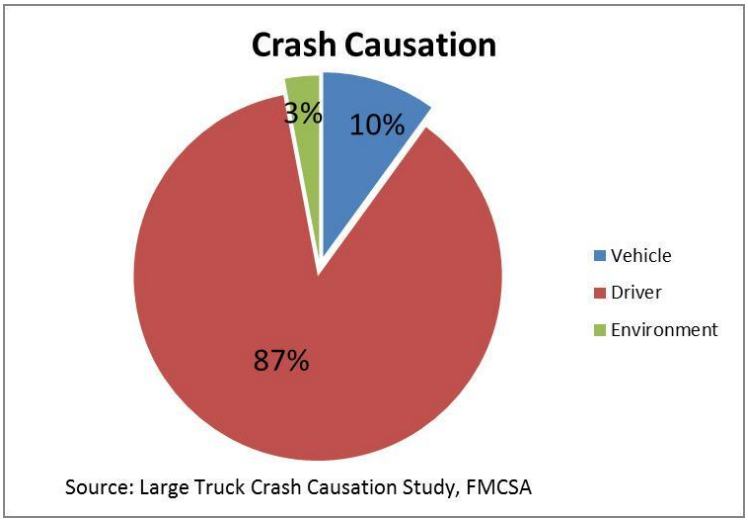
ATA also supports and promotes the voluntary adoption and use of cost-beneficial active safety technologies such as collision mitigation systems, active braking technologies and video-based systems designed to address driver behavior issues.

Continued Improvement Requires a Focus on Crash Causation

Continued improvements in truck safety require an understanding of the causes of truck crashes and a clear, determined focus on appropriate countermeasures. Specifically, according to multiple studies, data, and other indicators, the vast majority of large truck crashes are the result of driver behaviors and errors. Only a small percentage of large truck crashes are attributable to vehicle defects.

FMCSA's Large Truck Crash Causation Study, for example, found that driver error was the "critical reason" behind 87% of crashes studied.[15] Similarly, the *Unsafe Driving* BASIC in

[15] *Report to Congress on the Large Truck Crash Causation Study*, Federal Motor Carrier Safety Administration, Washington, D.C., November 2005, http://ai.fmcsa.dot.gov/ltccs/data/documents/reportcongress_11_05.pdf.



FMCSA's CSA Safety Measurement System, which captures moving violations and other unsafe driving behaviors, is the measurement category with the strongest correlation to crash risk. A recent FMCSA study found that, on average, fleets with high scores[16] in this category have 93% higher future crash rates than fleets with low scores.[17]

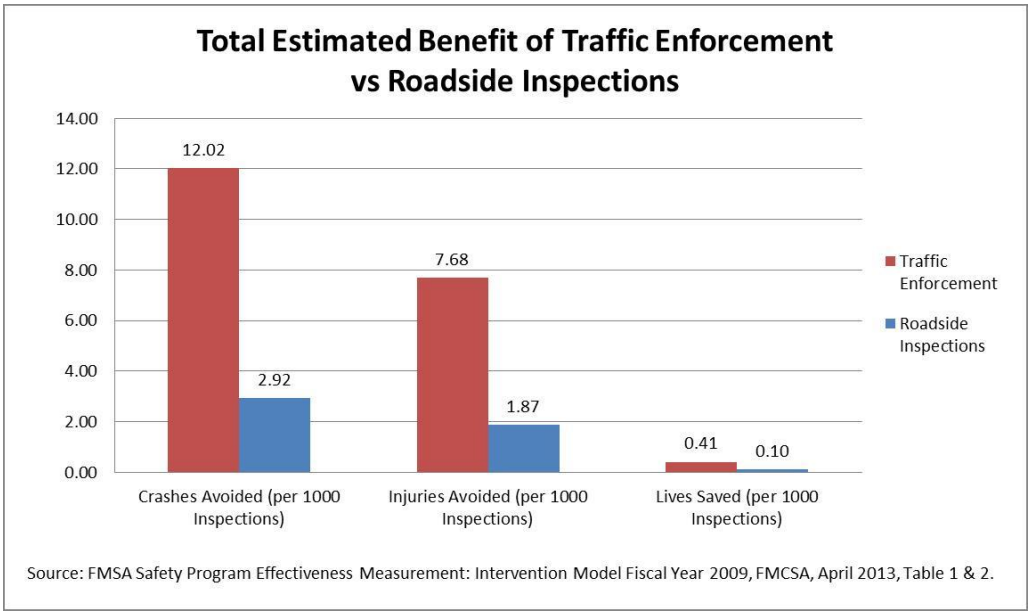
Given this knowledge, it is not surprising that other FMCSA data, specifically the agency's Safety Program Effectiveness Measurement reports, shows that on-road traffic enforcement activity is far more effective at preventing future crashes than standard roadside vehicle inspection activity. The latter typically involves a vehicle inspection to detect component defects and a review of driver's paper work (e.g. hours of service records of duty status) and credentials (e.g., license and medical examiner's certificate). The former, traffic enforcement, consists of on-road monitoring of unsafe driver behavior (e.g., moving violations) coupled with some form of inspection activity (e.g., a "walk-around" inspection of vehicle components). **FMCSA's data reflects that for every 1,000 traffic enforcements 12.05 crashes are prevented compared to 2.7 crashes per 1,000 standard roadside inspections. Similarly, .41 lives are saved per 1,000 traffic enforcements compared with only .09 lives per 1,000 roadside inspections. In other words, traffic enforcements are more than four times more effective at preventing crashes and saving lives.[18]**

The following table, taken from the FMCSA effectiveness report, shows the breakdown of crashes and injuries avoided and lives saved by roadside inspections and traffic enforcements respectively.

[16] High scores in this context means above the threshold for enforcement intervention selection which, for most carriers, is set at the 65th percentile.
[17] Below CSA enforcement intervention selection thresholds.
[18] *FMCSA Safety Program Effectiveness Measurement: Intervention Model Fiscal Year 2009*, FMCSA, April 2013, Page 10, http://ai.fmcsa.dot.gov/CarrierResearchResults/PDFs/13-039-Intervention-FY-2009.pdf.

Table 7. Program Effectiveness: U.S. Domiciled vs. Non-U.S. Domiciled Carriers, FY 2009

Types of Benefits	Estimated Benefits: U.S.	Estimated Benefits: Non-U.S.	Estimated Benefits per 1,000 Interventions: U.S.	Estimated Benefits per 1,000 Interventions: Non-U.S.
Crashes Avoided Due to Roadside Inspections	6,768	1,375	2.70	4.91
Crashes Avoided Due to Traffic Enforcements	8587	201	12.05	11.13
Total Crashes Avoided	***15,355***	***1,576***	***4.77***	***5.29***
Injuries Avoided Due to Roadside Inspections	4,324	878	1.72	3.14
Injuries Avoided Due to Traffic Enforcements	5486	128	7.70	7.11
Total Injuries Avoided	***9,810***	***1,006***	***3.05***	***3.38***
Lives Saved Due to Roadside Inspections	229	47	0.09	0.17
Lives Saved Due to Traffic Enforcements	290	7	0.41	0.37
Total Lives Saved	***519***	***54***	***0.16***	***0.18***



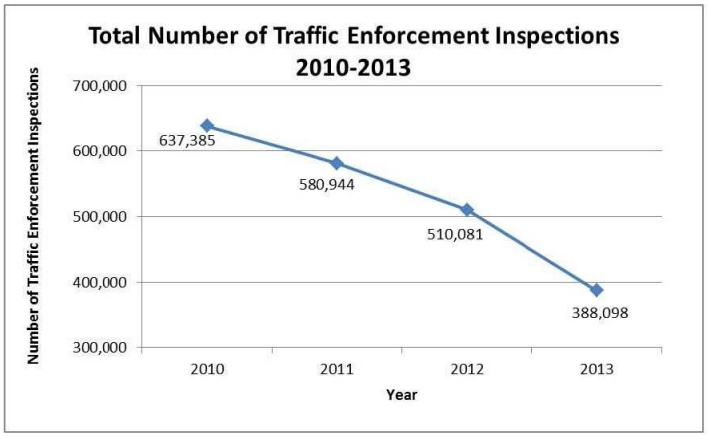
Source: FMSA Safety Program Effectiveness Measurement: Intervention Model Fiscal Year 2009, FMCSA, April 2013, Table 1 & 2.

Given this compelling data, it's logical to place more emphasis on traffic enforcements than on roadside inspections. However, figures available on FMCSA's website demonstrate that traffic enforcements only comprise a small portion of field enforcement interventions. For instance, in fiscal year 2013, traffic enforcements represented only 10% of all such activities. Further, this same website (screenshot shown below) reflects that the portion of field enforcement activity devoted to traffic enforcements has been declining dramatically, despite FMCSA research finding that it is more than four times more beneficial. For instance, the number of traffic enforcements in FY 2010 totaled 637,385, but dropped a whopping 39% to 388,004 in FY 2013. This is disturbing for a number of reasons, including the fact that traffic enforcement violation data feeds the CSA *Unsafe Driving* BASIC. As mentioned above, this BASIC has the strongest correlation to future crash risk of any CSA measurement category. Fewer traffic enforcements means less data in the *Unsafe Driving* BASIC which, in turn, hampers FMCSA's oversight efforts.

FMCSA's program effectiveness document points out that the "*evaluation provides FMCSA and State MCSAP partners with a quantitative basis for optimizing the allocation of safety resources in the field*." This statement is true, but it appears as though FMCSA and its state partners have not actually used the evaluation for this purpose. If the agency and states had done so, we would have observed an *increase* in traffic enforcement activity, not a *decline*. This troubling decline begs the question: "How many lives would not have been lost if traffic enforcement activity had remained constant or increased over the last several years?"

Traffic Enforcement Activity Summary

Activity Summary	FY 2010			FY 2011			FY 2012			FY 2013			FY 2014		
	Fed	State	Total	Fed	State	Total	Fed	State	Total	Fed	State	Total	Fed	State	Total
Number of Traffic Enf. Inspections	2,121	635,264	637,385	2,552	578,392	580,944	1,768	508,313	510,081	916	387,182	388,098	485	252,150	252,635
With Moving Violations	15	234,830	234,845	18	214,720	214,738	39	197,548	197,587	12	202,910	202,922	21	134,232	134,253
With Drug & Alcohol Violations	0	1,286	1,286	0	1,215	1,215	0	1,172	1,172	0	964	964	0	550	550
With Railroad Crossing Violations	0	400	400	2	383	385	0	359	359	2	327	329	0	195	195
With Non-specified State Law/Miscellaneous Violations	2,106	427,765	429,871	2,538	383,638	386,176	1,741	326,217	327,958	902	194,228	195,130	466	123,932	124,398
Number of Traffic Enf. Violations	2,228	779,647	781,875	2,667	696,641	699,308	1,846	605,447	607,293	935	436,476	437,411	494	284,389	284,883
Moving Violations	15	243,279	243,294	19	222,609	222,628	42	203,731	203,773	12	209,877	209,889	23	139,457	139,480
Drug & Alcohol Violations	0	1,553	1,553	0	1,458	1,458	0	1,393	1,393	0	1,205	1,205	0	655	655
Railroad Crossing Violations	0	401	401	2	384	386	0	360	360	2	330	332	0	196	196
Non-specified State Law/Miscellaneous Violations	2,213	534,414	536,627	2,646	472,190	474,836	1,804	399,963	401,767	921	225,064	225,985	471	144,081	144,552



It is clear from this data that FMCSA and its state partners have a substantial opportunity to improve truck safety through a more effective allocation of enforcement resources. However, seizing on this opportunity will require difficult choices and a willingness to challenge traditional approaches to enforcement. A shift from roadside inspections to more traffic enforcement will have personnel and structural impacts at the state level. For instance, since many state officials who conduct vehicle inspections don't have traffic enforcement authority, their livelihoods may be threatened. Further, since some of the lead state commercial motor vehicle enforcement agencies don't have traffic enforcement responsibility, they will have to either yield resources, or entire management of the state's commercial motor vehicle enforcement program, to another state agency. However, it is clear from the data that these difficult steps that must be embraced and implemented in the interest of further reducing crashes and saving lives.

Improvements in truck safety are also encumbered by program prioritization. Though the principle causes of crashes are known, FMCSA's priorities and resources are not always well aligned with them. For example, because the leading factor in crashes is vehicle speed, in 2006 ATA and Roadsafe America petitioned the National Highway Traffic Safety Administration (NHTSA) and FMCSA to require that speed limiters be set on all commercial motor vehicles over 26,000 lbs. In late 2010, over four years later, NHTSA granted the petitions and agreed to conduct a rulemaking to require that limiters on new vehicles be set. FMCSA later announced it would conduct a companion rulemaking, presumably to require that limiters be set on existing vehicles and to prohibit device tampering. However, neither agency has issued a proposed rule to address this leading cause of crashes, and eight years have passed since ATA and Roadsafe America petitioned them to do so.

In contrast, over the past four years FMCSA has spent more time, energy and resources on the hours of service (HOS) rulemaking than any other. Yet, by the agency's own admission, changes to the HOS rules recently imposed will prevent less than 1% of truck involved

fatalities.[19] Given this relatively modest benefit, the agency justified the rulemaking by making the speculative claim that the new rules will improve driver health and longevity.

Necessary Steps for Continued Improvement

In evaluating ways to further improve truck safety, FMCSA should consider the primary causes of truck crashes and appropriate countermeasures, including those advocated by the trucking industry. For instance, since the vast majority of crashes are caused by driver error and since moving violations are strong predictors of future crashes, ATA has long called for a national system to promptly notify employers of drivers' convictions for moving violations. Such employer notification systems (ENS) are available in some states, like California, but not in all. Accordingly, ATA has urged implementation of a *national* system. In MAP-21, Congress mandated that FMCSA develop a plan for a national system.

Similarly, since the late 1990s ATA has urged FMCSA to establish and deploy a national clearinghouse of drivers' positive drug and alcohol tests and refusals. Such a database would close an existing loophole that allows drivers who violate the drug and alcohol regulations to evade the consequences of their actions by merely obtaining employment elsewhere. As a result of a MAP-21 requirement, FMCSA recently proposed to establish a national clearinghouse, a decade after the agency's report to Congress said that a database of this sort was feasible and would be beneficial.[20]

ATA has proposed a number of other beneficial safety initiatives as well. For instance, ATA supports the use of more effective hair tests to meet FMCSA drug testing requirements, broader third party access to FMCSA's Pre-Employment Screening Program (PSP), and the aforementioned speed limiter mandates. Each of these initiatives is supported by data demonstrating crash reduction efficacy.

ATA's Views on Current Regulatory Issues

Given the context of this hearing, it is appropriate to offer ATA's views on other truck safety issues. In particular, I will focus on the following:

- Hours of Service
- Compliance, Safety, Accountability
- Electronic Logging Devices

1. Hours of Service

As discussed above, ATA has been critical of FMCSA's continued focus on changes to the hours of service regulations. Operating under the previous hours of service regulations, the

[19] 2010-2011 Hours of Service Rule Regulatory Impact Analysis, Federal Motor Carrier Safety Administration, Washington, D.C., December, 2011, page 6-7 (102), http://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/2011_HOS_Final_Rule_RIA.pdf.

[20] *A Report to Congress On the Feasibility and Merits of Reporting Verified Positive Federal Controlled Substance Test Results To the States and Requiring FMCSA-Regulated Employers to Query the State Databases Before Hiring a Commercial Drivers License (CDL) Holder*, Federal Motor Carrier Safety Administration, March 2004, Pg. 2.

number and rate of truck involved crashes, injuries and fatalities all declined dramatically. Accordingly, ATA advocated for retention of those rules rather than the changes FMCSA implemented in 2013.

It is important to point out that ATA supports five of the six main components of the rules, including the 11-hour limit on driving time per shift, the maximum 14-hour driving window, the minimum off-duty period of at least 10 consecutive hours, the cumulative (or weekly) on-duty time limits, and the mandatory rest break provision. ATA's only quarrel is with the restrictions recently placed on use of the restart provision. These restrictions are unwarranted, have unintended economic impacts, and may actually increase risk. For instance, a recent FMCSA study shows that drivers operating under the new restart rules are more likely to operate during the daytime, when the risk of vehicle interaction and crashes is higher.[21] For these reasons, ATA supports legislation to suspend enforcement of the recent restart restrictions pending a study of their unintended safety and economic impacts.

ATA also supports the current Government Accountability Office review of the Congressionally-mandated FMCSA field study of the restart rules and the agency's regulatory impact analysis used to justify the new rules. This independent, third-party review is welcomed by ATA.

2. Compliance, Safety, Accountability

Since its inception, ATA has been publicly supportive of the *objectives* of CSA and has worked cooperatively with FMCSA to address concerns with the program. ATA believes in a data-driven approach to identifying unsafe operators and focusing FMCSA's limited resources on those that pose the greatest safety risk. Unfortunately, ATA has serious apprehension about CSA's ability to accurately identify the least safe motor carriers.

Many of ATA's concerns were recently highlighted by the Government Accountability Office's report *Modifying the Compliance, Safety, Accountability Program Would Improve the Ability to Identify High Risk Carriers.*[22] The study confirmed many shortcomings of the program including: a dearth of data which results in a great majority of motor carriers not being scored; a lack of a statistical correlation between the vast majority of regulatory violations and crash risk, and the fact that small carriers are far more likely to be negatively impacted by CSA. Moreover, GAO found that CSA is an imprecise tool that cannot accurately identify an individual fleet's crash risk, and that until deficiencies are addressed, it is inappropriate to pursue a rulemaking to tie safety fitness determinations to CSA safety measurement system scores.

These limitations are of great concern to the trucking industry because third parties (e.g. shippers, brokers, insurers, banks, etc.) use publicly available CSA scores to make important business decisions. In these cases, inaccurate scores can have serious business implications. As such, ATA supports and is advocates removing CSA scores from public view until peer

[21] *Field Study on the Efficacy of the New Restart Provision for Hours of Service*, Federal Motor Carrier Safety Administration, Washington, D.C. January, 2014.

[22] *Modifying the Compliance, Safety, Accountability Program Would Improve the Ability to Identify High Risk Carriers*, Government (Washington, D.C.: Government Accountability Office, February 2014), http://www.gao.gov/assets/670/660610.pdf.

reviewed research confirms a strong statistical correlation between individual fleets' scores in each BASIC and future crash risk.

Additionally, ATA believes that CSA should only include crashes that were caused by commercial motor vehicle drivers. Intuitively, if a driver did not cause and could not have prevented a crash from happening, the occurrence is not indicative of his/her employer's safety management controls. Unfortunately, CSA currently considers all crashes, regardless of fault. FMCSA responded to this concern by conducting a study of the efficacy of using police accident reports to make crash accountability determinations. Though the study and its peer reviews are complete, FMCSA has delayed its release. ATA calls on FMCSA to release the results of their analysis and to immediately begin work on identifying and removing from CSA crashes not caused by commercial drivers.

3. Electronic Logging Devices

ATA supports FMCSA's efforts to mandate electronic logging devices (ELDs) for all drivers required to maintain records of duty status. ELDs are the most reliable and accurate way to track compliance with the HOS regulations. ATA applauds FMCSA on the February publication of its Supplemental Notice of Proposed Rulemaking on this matter and encourages the agency to work toward swift publication of a defensible final rule.

Overall, ATA is pleased with the agency's proposal and has provided a few suggestions for improvement. Among others, ATA warned FMCSA of the potentially chilling effect on voluntary early adoption should FMCSA proceed with its proposed two-year period for grandfathering of existing equipment. ATA suggests allowing existing, compliant, Automatic On-Board Recording Devices (AOBRD) to be used for the remainder of the service life of the vehicles in which they are installed. ATA also feels the proposed supporting documents requirements are excessive and unnecessary given the accuracy with which ELDs automatically track driving time.

Finally, ATA urges FMCSA to explore ways that the agency can actively promote voluntary ELD adoption through the use of incentives. Given the known benefits of ELD use and recognizing that a mandatory adoption is still several years away, incentives for voluntary adoption are appropriate.

Conclusion

Mr. Chairman, thank you for the opportunity to offer our views on how we can further improve truck and highway safety. As I mentioned at the beginning of my testimony, the trucking industry is justifiably proud of its commitment to safety and long-term safety record. However, continuation of this trend will require an acknowledgement of the principle causes of truck crashes and a commitment to implementing appropriate countermeasures to address them. Moreover, it will require the agency to prioritize its action based not on political or other interests, but on sound safety benefit data.

In addition to making choices about policy priorities, FMCSA and its state partners must confront the tough decisions and fundamental organizational changes needed to embrace a more effective enforcement program in the field. Specifically, to leverage additional safety

benefits from funding of on-road enforcement programs, FMCSA and state partners will need to place additional emphasis on traffic enforcement activities. Doing so may impact state organizations, but is ultimately necessary is order to achieve the greatest safety dividends from limited enforcement resources.