



January 17, 2020

Honorable William Straus, House Chair  
Honorable Joseph Boncore, Senate Chair  
Joint Committee on Transportation  
State House, Room 134  
Boston, Massachusetts 02133

Dear Chair Straus, Chair Boncore, and Members of the Committee:

On behalf of the over 250 member companies of the Trucking Association of Massachusetts (“TAM”) which employ thousands of individuals throughout the Commonwealth, I am writing in regard to House Bill 3013, Senate Bill 2115, House Bill 3143, and House Bill 3089 filed relative to autonomous vehicles. We ask that you consider the potential impact of regulating autonomous vehicles carrying passengers on the trucking industry as it begins to implement autonomous technology on its trucks.

The TAM recognizes the importance of considering regulations on passenger vehicles at this time, but autonomous technology as related to autonomous trucks is still developing and will have the ability to benefit all aspects of the industry. Regulations on passenger vehicles at this time may inadvertently limit the use of these autonomous trucks in the future. A fully autonomous truck will have the ability to identify, interact with and safely react to all aspects of the driving environment without a driver in control of the wheel. However, it may be decades before this vehicle could be commercially available. For your reference, we have again enclosed a report by the American Transportation Research Institute (ATRI) that outlines the future of AV technology in the trucking industry.

There are different levels of “autonomy” that come with different technologies, functionalities, and expectations. The National Highway Traffic Safety Administration (NHTSA) and the Society of Automotive Engineers (SAE) have developed automation scales ranging from Level 0 of no automation to Level 5 of full automation where no operator is present in the truck. Level 3 is conditional automation where an automated system can actually conduct some parts of the driving task, but there must be a driver present to take back control of when the automated system requests. The timeline of Level 3 and Level 5 trucks replacing the existing US trucks is dependent on the investment in research and development.

The progressive implementation of these levels of autonomous technology will benefit the industry as it will increase driver health and wellness and their productivity, address industry issues of

driver shortage and retention, and decrease need for truck parking facilities. Road safety will also increase as urban congestion is mitigated with the widespread use of autonomous vehicles.

Drivers currently work and drive in 14-hour shifts driving up to 11 of those hours. Autonomous trucks would allow for drivers to take more rest breaks, simultaneously increasing road safety with driver awareness and increasing productivity. Due to these conditions, there is currently a shortage of 48,000 drivers that will increase to 175,000 drivers by 2024. To address this issue, the use of autonomous technology can make truck driving an attractive career as it decreases fatigue and stress, and allows drivers to get home earlier. The technology would also decrease the number of trucks needed, leading to a decreased driver shortage.

Please refer to the attached report by ATRI for further information of the impact of autonomous technology on the trucking industry when considering the legislation regarding autonomous vehicles before your committee. I appreciate your consideration of this important matter. If you have any questions please do not hesitate to contact me.

Sincerely,

Sincerely,

A handwritten signature in cursive script that reads "Kevin R. Weeks".

Kevin Weeks  
Executive Director