ADVOCATES FOR HIGHWAY & AUTO SAFETY

March 25, 2025

The Honorable David Rouzer, Chair
The Honorable Eleanor Holmes Norton, Ranking Member
Committee on Transportation and Infrastructure
Subcommittee on Highways and Transit
United States House of Representatives
Washington, D.C. 20515

Dear Chair Rouzer and Ranking Member Norton:

Thank you for convening tomorrow's hearing, "America Builds: How Trucking Supports American Communities." Truck drivers and the trucking industry are critical to our Nation's supply chain and the movement of essential goods. Improving the safety of our roadways will both optimize efficiency and ensure that truck drivers and all road users return home to their loved ones after their travels. Advocates for Highway and Auto Safety (Advocates) respectfully requests this letter be included in the hearing record.

**Motor Vehicle Crash Fatalities and Injuries are Alarmingly High and Extremely Costly**
Americans suffer a significant death and injury toll caused by preventable crashes. On average, 116 people were killed every day on roads in the U.S., totaling just over 42,500 fatalities in 2022.[1] This is a 26 percent increase in deaths in just a decade.[2] An additional 2.38 million people were injured.[3] Early projections for 2023 traffic fatalities remain at a similar historic high level; nearly 41,000 people are estimated to have died that year.[4]

In addition to the physical and emotional repercussions of motor vehicle crashes, the annual economic cost is approximately $340 billion (2019 dollars).[5] This figure equates to every person living in the U.S. essentially paying an annual "crash tax" of over $1,000. Moreover, the total value of societal harm from motor vehicle crashes in 2019, which includes loss of life, pain and decreased quality of life, was nearly $1.4 trillion.[6] When adjusted solely for inflation, this figure amounts to over $1.72 trillion.[7] Research from the Network of Employers for Traffic Safety (NETS), finds motor vehicle crashes cost employers $72.2 billion in direct crash-related expenses in 2019.[8]

These devastating crashes impact millions of Americans each year including the family of U.S. Department of Transportation (DOT) Secretary Duffy, Members of Congress and truck drivers. These tragedies result in long-lasting impacts which often are not accounted for in statistics alone. For every single death and serious injury, there is a horrific ripple effect forever changing the lives of children, parents, friends and communities.

**Truck Crashes Also Are Disturbingly High and Expensive**
We all rely on our infrastructure system for household supplies to be delivered, for family vacations to be enjoyed, and for our Nation's economy to thrive. America's roads are moving an ever-increasing number of people and goods.[9] However, since 2009, the number of fatalities in large truck crashes has

increased by 76 percent.[10] In that same timespan, the number of people injured in crashes involving large trucks rose by 117 percent.[11] In fatal two-vehicle crashes between a large truck and a passenger motor vehicle, 96 percent of the fatalities were occupants of the passenger vehicle.[12]

Truck driving is identified as one of the most dangerous occupations in the U.S. by the Bureau of Labor Statistics.[13] In 2022, 5,936 people were killed and over 160,000 people were injured in crashes involving large trucks.[14] This includes the deaths of 1,097 occupants of large trucks.[15] While early estimates indicate that the number of fatalities in crashes involving large trucks is predicted to decline by eight percent from 2022 to 2023, the estimated 5,439 fatalities is still eight percent higher than 2019 before the recent pandemic.[16]

According to the Federal Highway Administration (FHWA), traffic incidents, which include crashes, are one of the seven main causes of traffic congestion which erodes the reliability of travel time.[17] The report notes that for truck operators, "[t]he cost of unexpected delay can add another 20 percent to 250 percent" to their hourly costs.[18] The cost to society from crashes involving large trucks and buses was estimated to be $128 billion in 2021, the latest year for which data is available.[19] When adjusted solely for inflation, this figure amounts to over $151 billion.[20]

**Solutions to Improve Roadway Safety are Available and Proven**

***Automatic emergency braking systems (AEB):*** According to the Insurance Institute for Highway Safety (IIHS), equipping large trucks with forward collision warning and AEB could eliminate more than two out of five crashes in which a large truck rear-ends another vehicle.[21] In 2015, Advocates, along with the Center for Auto Safety, the Truck Safety Coalition (TSC) and Road Safe America, filed a petition with the National Highway Traffic Safety Administration (NHTSA) seeking the issuance of a rule to require forward collision avoidance and mitigation braking systems (F-CAM), now more commonly known as AEB, on commercial motor vehicles (CMVs) with a gross vehicle weight rating (GVWR) of 10,000 pounds or more.[22] The agency granted Advocates' petition in October 2015 but no subsequent action has been taken.[23] The Infrastructure Investment and Jobs Act (IIJA) requires DOT to issue a Final Rule by November 2023 for AEB in large CMVs and the issuance of a Federal Motor Carrier Safety Regulation (FMCSR) to require drivers use AEB.[24] DOT issued a Notice of Proposed Rulemaking (NPRM) in July 2023.[25] Advocates submitted comments to the NPRM. When this Rule is completed and implemented, it will have a significant impact on safety and result in substantial reductions in highway deaths and injuries.[26]

***Speed limiting devices:*** According to the Federal Motor Carrier Safety Administration (FMCSA), 10,440 people were killed from 2004 to 2013 in crashes where the speed of the CMV likely contributed to the severity of the crash.[27] On average, that is over 1,000 lives lost annually to speeding CMVs. In September 2016, NHTSA and FMCSA issued a joint NPRM to require vehicles with a GVWR of more than 26,000 pounds to be equipped with a speed limiting device.[28] The NPRM estimated that setting the device at 60 MPH has the potential to save almost 500 lives and prevent nearly 11,000 injuries annually.[29] Setting the speed at 65 MPH could save as many as 214 lives and prevent approximately 4,500 injuries each year.[30] Subsequently, in May 2022, FMCSA issued an Advanced Notice of Supplemental Proposed Rulemaking; no subsequent action has been taken.[31] Research shows that the technology is currently being used by 77 percent of trucks on the road in the United States.[32] It is incumbent that the DOT finally complete this rulemaking or more lives will be needlessly lost.

***Truck parking:*** The lack of safe and convenient truck parking merits federal action. Yet, dedicating more federal funding to building parking facilities likely will not solve the issue alone. Studies have demonstrated that the parking shortage is often most acute in areas of the country, such as along the Interstate 95 corridor in the Northeast, where building facilities for parking may not be realistic due to costs and scarcity of open land.[33] As such, along with providing funding to address this issue, Advocates urges policymakers to examine additional remedies to address this problem such as use of existing dormant facilities.

**Weakening Essential Safety Regulations is Irreconcilable with Roadway Safety**

***Federal limits on the weight and size of interstate CMVs:*** Current maximum weights and lengths for CMVs aim to protect truck drivers, the traveling public, and our Nation's roads, bridges and other infrastructure components. Even with these thresholds, the American Society of Civil Engineers (ASCE) reports "these vital lifelines are frequently underfunded, and over 40% of the system is now in poor or mediocre condition."[34] In their 2025 Report Card which was released today, roads received a grade of "D+," with 39 percent in poor or mediocre condition.[35] Bridges received a "C," with about a third of the nation's bridge inventory (221,791 spans) in need of repair replacement. In addition, approximately 45 percent of bridges have exceeded their planned design lives of 50 years.[36] Moreover, driving on deteriorated and congested roads still costs the average driver over $1,400 per year in vehicle operating costs and lost time.[37]

The U.S. DOT Comprehensive Truck Size and Weight Study found that introducing double 33-foot trailer trucks, known as "Double 33s," would be projected to result in 2,478 bridges requiring strengthening or replacement at an estimated one-time cost of $1.1 billion.[38] This figure does not account for the additional, subsequent maintenance costs which will result from longer, heavier trucks. In fact, increasing the weight of a heavy truck by only 10 percent increases bridge damage by 33 percent.[39]

Raising truck weight or size limits could result in an increased prevalence and severity of crashes. Longer trucks come with operational difficulties such as requiring more time to pass, having larger blind zones, crossing into adjacent lanes, swinging into opposing lanes on curves and turns, and taking a longer distance to adequately brake. In fact, double trailer trucks have an 11 percent higher fatal crash rate than single trailer trucks.[40] Overweight trucks also pose serious safety risk. Brake violations are a major reason for out-of-service violations.[41] According to a North Carolina study by IIHS, trucks with out-of-service violations are 362 percent more likely to be involved in a crash.[42] This is also troubling considering that tractor-trailers moving at 60 miles per hour are required to stop in 310 feet – the length of a football field – once the brakes are applied.[43] Actual stopping distances are often much longer due to driver response time before braking and the common problem that truck brakes are often not in adequate working condition.

Despite claims to the contrary, bigger trucks will not result in fewer trucks. Following every past increase to federal truck size and weight limits, the number of trucks on our roads has gone up. Since 1982, when Congress last increased the gross vehicle weight limit, truck registrations have more than doubled.[44] The U.S. DOT study also addressed this meritless assertion and found that any potential mileage efficiencies from the use of heavier trucks would be offset in just one year.[45]

There is overwhelming opposition to any increases to truck size and weight limits. The public, local government officials, safety, consumer and public health groups, law enforcement, first responders, truck drivers and labor representatives, families of truck crash victims and survivors, and even

Congress on a bipartisan level have all rejected attempts to increase truck size and weight limits. Also, the technical reports released in June 2015 from the U.S. DOT Comprehensive Truck Size and Weight Study concluded there is a "profound" lack of data from which to quantify the safety impact of larger or heavier trucks and consequently recommended that no changes in the relevant truck size and weight laws and regulations be considered until data limitations are overcome.[46]

***Minimum age requirements for interstate truck drivers:*** CMV drivers under the age of 19 are four times more likely to be involved in fatal crashes, as compared to CMV drivers who are 21 years of age and older, and CMV drivers ages 19-20 are six times more likely to be involved in fatal crashes (compared to CMV drivers 21 years and older).[47] Yet, some segments of the trucking industry have been pushing to allow teenagers to operate CMVs in interstate commerce for more than 20 years, often relying on their own forecasts for the number of drivers needed as a rationale. These projections have consistently failed to materialize.[48] The trucking industry continues to face a driver retention crisis, not a driver shortage. Past witnesses representing parts of the trucking industry have testified during hearings before the Subcommittee that there is not a driver shortage and perpetuating this falsehood could negatively affect the supply chain.[49]

***Truck drivers' hours of service and electronic logging devices (ELDs):*** Self-reports of fatigue, which almost always underestimate the problem, find that fatigue in truck operations is a significant issue. In a 2006 driver survey prepared for the Federal Motor Carrier Safety Administration (FMCSA), "65 percent [of drivers] reported that they often or sometimes felt drowsy while driving" and almost half (47.6 percent) of drivers said they had fallen asleep while driving in the previous year.[50] In fact, the National Transportation Safety Board (NTSB) has repeatedly cited fatigue as a major contributor to truck crashes as determined by its investigations.[51] Expanding the hours truck drivers can drive or undermining use of ELDs to track driving hours as a rationale for moving more goods puts truck drivers, their loads and everyone on the roads with them at risk.

***Automated driving system (ADS) technology:*** Autonomous driving technology has made advances yet remains unable to consistently operate safely with all road users, conditions and scenarios, as evidenced by fatal and serious crashes involving passenger motor vehicles equipped with ADS of varying levels.[52] Transparency and robustness in crash and incident data reporting involving vehicles equipped with ADS are critical to the safety of public roads, the management of cities in which they are operating, for researchers and related industries as well as for Congress and the DOT as it considers legislative and regulatory proposals. Further, if those incidents had involved autonomous commercial motor vehicles (ACMVs), which are larger and heavier with more stopping distance needed, the results could have been even more catastrophic, and the death and injury toll could have been much worse. Some of the most pressing safety shortcomings associated with autonomous vehicle (AV) technology, which include the ADS properly detecting and reacting to all other road users, driver engagement and cybersecurity, are exponentially amplified by the greater crash force of an ACMV. As such, it is imperative that ACMVs be subject to comprehensive safety regulations, including having a licensed driver behind the wheel for the foreseeable future.

The interest in expanding the use of this technology must not be used as a pretext to eviscerate essential safety regulations administered by the FMCSA, and particularly in the absence of new standards to ensure the technology performs safely and as needed. The public safety protections provided by the Federal Motor Carrier Safety Regulations (FMCSRs) have become no less important or applicable simply because a CMV has been equipped with an ADS. In fact, additional substantial public safety concerns are presented by ACMVs.

Advocates and numerous stakeholders developed the "AV Tenets," policy positions which should be foundational to any AV legislation.[53] The AV Tenets have four main, commonsense categories including: 1) prioritizing safety of all road users; 2) guaranteeing accessibility and equity; 3) preserving consumer and worker rights; and, 4) ensuring local control and sustainable transportation. While the AV Tenets were developed for application to vehicles under 10,000 pounds, many of the principles also could apply to larger commercial vehicles. At a minimum, ACMVs must meet safety standards for the ADS and related systems, including for cybersecurity, and operations must be subject to adequate oversight as a starting point for their potential deployment.

**Conclusion**

In December 2024, Advocates released a public opinion poll that found 9 of 10 adults surveyed are concerned about themselves or their loved ones getting into motor vehicle crashes.[54] The survey noted that 88 percent of respondents affirmed sharing the roads with driverless trucks presented concern, with 69 percent acknowledging a high level of concern.[55] The high percentage expressing concern was regardless of political affiliation or region.[56]

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This Subcommittee and the 118th Congress advanced a comprehensive and meaningful set of actions to improve safety in the most recent surface transportation reauthorization law. The DOT must implement the directives to address the motor vehicle crash fatality and injury toll, and we urge Congress to prioritize proven safety measures and funding for such in the next transportation reauthorization legislation.

Thank you for your consideration of these issues. We look forward to working with you to improve safety on our Nation's roadways.

Sincerely,

Catherine Chase
President

cc: Members of the U.S. House of Representatives Committee on Transportation and Infrastructure

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[11] *Id*. Note, the 117 percent figure represents the overall change in the number of people injured in large truck involved crashes from 2009 to 2022. However, between 2015 and 2016 there was a change in data collection at U.S. DOT that could affect this calculation. From 2009 to 2015 the number of people injured in truck-involved crashes increased by 59 percent, and between 2016 to 2022, it increased by 19 percent, and between 2015 and 2015, it increased by 14 percent.
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[25] 88 FR 43174, July 6, 2023.
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[28] SL 2016 NPRM.
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[30] *Id.*
[31] 86 FR 26317 (May 4, 2022)
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