

July 13, 2022

Robin Hutcheson
Acting Administrator
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Advance notice of proposed rulemaking; Parts and accessories necessary for safe operations; Speed limiting devices. Docket No. FMCSA-2022-0004.

Dear Acting Administrator Hutcheson:

The Insurance Institute for Highway Safety (IIHS) welcomes the opportunity to comment on the Federal Motor Carrier Safety Administration's (FMCSA's) proposal to require the use of speed limiters on large trucks. As it did in 2016 (Teoh, 2016), IIHS supports the proposed speed limiter requirement, encourages FMCSA to expand it, and strongly urges FMCSA to finalize rulemaking without further delay.

Limiting speeds is especially important for large trucks. High vehicle speed is a well-understood issue across all areas of highway safety and is associated with increases in both the likelihood and severity of crashes. Although the use of speed limiters on large trucks has raised concerns about creating speed differentials between trucks and other vehicles, research has documented that trucks already travel significantly slower than passenger vehicles (Retting & Greene, 1997; Retting & Teoh, 2008), including on roads with speed limits raised to among the highest in the nation (Hu, 2016). While trucks travel slower than other vehicles, even small percentages of trucks traveling at high speeds have the potential to cause harm. Large trucks expend more kinetic energy and require longer stopping distances than other vehicles, so limiting their speeds will greatly improve safety.


FMCSA should maximize the use of speed limiters and related technology on all vehicles it regulates. Specifically, there is no reason to exclude medium-duty trucks (classes 3 to 6) and FMCSA should pursue a retrofit requirement for speed limiters. While there may be technical challenges, one way to overcome these is to require the use of intelligent speed assistance and/or driver speed-monitoring technologies. Intelligent speed assistance uses automated sign recognition or geolocation data to identify speed limits and advise drivers on their travel speed. Some driver monitoring solutions include data on when drivers are speeding. Incentivizing the use of such technology in addition to speed limiters for vehicles where limiters are required can further improve safety outcomes. While a single maximum truck speed would improve highway safety, use of intelligent speed assist or driver speed monitoring would extend the benefits to lower speed roadways.

FMCSA should finalize rulemaking on speed limiters expeditiously. Since the speed limiter rulemaking process began years ago, states have raised maximum speed limits considerably and the COVID-19 pandemic has been associated with massive increases in crash deaths (IIHS, 2022; National Center for Statistics and Analysis [NCSA], 2022) and speeding (Cambridge Mobile Telematics, 2021; Office of Behavioral Safety Research, 2021). So, it is now more important than ever to improve highway safety from all angles, which is the paradigm known as the Safe System Approach, and one of its primary objectives is achieving safer speeds.

The Safe System Approach is part of the U.S. Department of Transportation's (USDOT's) National Roadway Safety Strategy. FMCSA should channel its regulatory power to maximize the use of speed limiters and related technology, thus making a timely and direct contribution to USDOT's life-saving strategy.

In summary, limiting speeds on large trucks has always been important, but with crash deaths and speeding increasing rapidly (IIHS, 2022; NCSA, 2022) it is now more important than ever for FMCSA to do its part in reversing these trends by finalizing rulemaking on the use of speed limiters and related technology carefully but without further delay.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Teoh', enclosed within a large, hand-drawn oval shape.

Eric Teoh
Director of Statistical Services

References

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