

**INSURANCE INSTITUTE
FOR HIGHWAY SAFETY**

October 15, 2002

The Honorable Robert A. McGuire
Associate Administrator for Hazardous Materials Safety
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street S.W.
Washington, D.C. 20590

The Honorable Brian McLaughlin
Acting Deputy Administrator
Federal Motor Carrier Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590

**Security Requirements for Motor Carriers
Transporting Hazardous Materials
Docket No. FMCSA-02-11650 (HM-232A)**

Dear Mr. McGuire and Mr. McLaughlin:

With regard to the U.S. Department of Transportation's (U.S. DOT) request for comments on the need for enhanced security requirements for transporting hazardous materials by motor carriers, the Insurance Institute for Highway Safety (IIHS) offers the following comments regarding vehicle tracking and monitoring measures. DOT can accomplish two objectives -- improving transportation security and reducing fatigue-related crashes -- by mandating automated tamper-resistant on-board recorders.

IIHS is a nonprofit organization that identifies ways to reduce deaths, injuries, and property damage from motor vehicle crashes. We have published extensively about the problem of fatigued commercial vehicle drivers (e.g., Braver et al., 1992) and have submitted numerous comments on proposed DOT rulemakings on this issue. In particular, we have submitted four petitions to require on-board recorders on long-haul commercial vehicles, most recently in 1995, and we have provided evidence of the safety benefits and affordability of such devices (IIHS, 2000, 2002a). Although we believe these devices should be required on all long-haul commercial vehicles, the need is especially important for vehicles transporting hazardous materials.

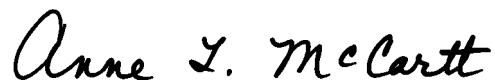
The United States has lagged behind many other countries, including those in the European Union, in mandating on-board recorders and developing performance standards (IIHS, 2002b). A large number of

Robert A. McGuire and Brian McLaughlin
October 15, 2002
Page 2

U.S. motor carriers already have installed vehicle tracking devices and on-board recorders on their tractors, although these motor carriers often do not use them for the purpose of monitoring compliance with hours-of-service limits. A recent report from the Federal Motor Carrier Safety Administration indicates a wide variety of available devices (Wright and Fogel, 2002). Many systems are linked to global positioning systems and/or wireless routing, navigation, and communication technologies, and most work with a "smart card" or unique driver identifier. Thus, the systems provide a greatly enhanced capability to monitor a driver's location and adherence to a trip schedule and to identify unusual trip events of potential concern. The systems also increase the ability of enforcement or border personnel to establish a driver's identity and credentials.

We urge DOT to move expeditiously to require automated tamper-resistant on-board recorders on all commercial vehicles transporting hazardous materials and to establish performance standards for their use. These devices will enhance the ability to detect suspicious vehicle movements, while also serving to deter fatigue-related crashes. Such requirements also should be extended to other commercial vehicles as quickly as possible to maximize the safety benefits of this technology.

Sincerely,



Anne T. McCartt, Ph.D.
Senior Research Associate

cc: Docket Clerk, Docket No. FMCSA-02-11650 (HM-232A)

References

Braver, E.R.; Preusser, C.W.; Preusser, D.F.; Baum, H.M.; Beilock, R; and Ulmer, R. 1992. Long hours and fatigue: a survey of tractor-trailer drivers. *Journal of Public Health Policy* 13:341-66.

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Robert A. McGuire and Brian McLaughlin
October 15, 2002
Page 3

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