



*A bold voice for transportation workers*

November 5, 2018

Mr. Finch Fulton  
Deputy Assistant Secretary for Transportation Policy  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**RE: Scope of the Study on the Impact of Automated Vehicle Technologies on Workforce**  
**Docket No: DOT-OST-2018-0150**

Dear Mr. Fulton,

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to DOT's request for comments on the scope of its survey concerning the impact of automated vehicle technologies on the workforce. TTD consists of 32 affiliate unions representing workers in all modes of transportation, including thousands of employees who may be impacted by vehicle automation.<sup>1</sup> For this reason, we have a vested interest in this study.

As DOT notes, the 2018 Consolidated Appropriations Act requires DOT and DOL to conduct a study of the impact of Advanced Driver Assist Systems (ADAS) and Highly Automated Vehicles (HAV) technologies on drivers and operators of commercial motor vehicles, including the labor and workforce impacts. TTD and its impacted unions fought hard to secure this report within legislation that otherwise provides hundreds of millions of dollars to further the development, testing, and deployment of autonomous vehicles. As we have written in a number of other DOT dockets, it is our position that if the federal government provides support for this technology it has an inherent obligation to support the millions of workers whose jobs may be put at risk. While only a first step, we are hopeful that this research provides a more complete picture to DOT, DOL and Congress on how automated vehicles could affect the professional drivers, maintenance workers and other employees in the affected industries nationwide.

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<sup>1</sup> Attached is a complete list of TTD's 32 affiliate unions.



Through this notice, DOT specifically requests information on the scope of the study and other issues or information that it should consider in order to best “calibrate the study strategy”. DOT has divided the report into four broad categories with research questions and study tasks for each category. We note that the history of transportation is one of continuously adapting to technological changes. The industry’s workers have shown a remarkable capacity to develop and apply the new skills required in a changing job market. As new technology has been introduced, federal policymakers have historically looked to organized labor as representatives of these workers and we hope to continue to provide a voice for the nation’s transportation workforce on these issues. Below are suggestions on items DOT should also consider its study for each category.

### **1) Labor Force Transformation/Displacement**

The questions posed in the first area of inquiry should yield valuable information on how automation could affect the labor force. We encourage DOT and DOL to consider several additional items. First, when examining labor force effects, we recommend that the agencies consider longer term impacts in addition to shorter-term metrics. For example, data shows that displaced workers often suffer career-long negative effects on wages. A recent study found that workers displaced by the 2008 recession were making on average 17% lower wages two years later, in 2010. We know that this phenomenon also exists for workers whose jobs were sent overseas, whose earnings frequently never fully recover. The agencies must not only consider how many jobs are lost and gained in the aggregate, but how that affects a worker’s financial wellbeing over the course of his or her career.

Similarly, the agencies should be cautious in any conclusions of positive effects. A future report must delineate between data that is presented without context, such as employment rate, and actual realities for working people. For the purpose of this study, DOT and DOL should not consider the loss of good paying jobs in exchange for gig economy jobs with low wages and no benefits as an equivalent trade off. The agencies must consider the kind of job a displaced worker is able to find, not just if they are able to find any employment.

### **2) Labor Force Training Needs**

TTD is encouraged by the study’s proposed focus on training and retraining programs, both for occupations within and outside the transportation sector. In addition to how training is conducted, and what kind of training is conducted, the agencies should also examine when training takes place. Engaging workers in training and retraining programs only after they have lost their job is both inefficient and detrimental. Efforts must be made to ensure the least disruptive outcomes for any employee who is displaced by automated vehicle technology.

We are also concerned that the research questions do not adequately address some of the barriers inherent in training displaced workers. For example, there are challenges intrinsic to training older employees, those with limited formal education and those with non-transferrable skillsets. It is critical that future programs acknowledge these realities – training programs that are inaccessible or unhelpful to a displaced workforce would represent a grave missed opportunity. The study should account for these hurdles.

The agencies should consider both geographic and demographic disparities. While it is possible that the automation sector creates some jobs, it may not do so in the same geographic locations where jobs were lost. It is therefore critical that training programs provide options for working families in the communities where they live. As with the above, training that does not result in accessible employment opportunities is not meaningful. It is also critical that such efforts reach all impacted workers. The agencies should give thought to how to best ensure that no segment of the workforce is unequally denied the opportunity to participate in training programs.

### **3) Technology Operational Safety Issues**

As DOT alludes to, ADAS technology or any automated vehicle technology in which the driver is expected to reengage control of the vehicle creates certain awareness and response time challenges. Existing data speaks to the difficulty a driver may have in taking back control in a situation in which the automated technology malfunctions or is unable to process certain conditions. In real world situations, this delay risks accidents that otherwise may not occur. In prior dockets to DOT administrations, we have raised concerns with how technology that shares responsibility with the operator, known as the human-machine interface, may affect safety. TTD has long expressed our opposition to any new technology that has the ultimate effect of decreasing safety, and DOT must not allow such technology on the nation's roadways. We support DOT's efforts to look to address this issue through this study.

### **4) Quality of Life Effects Due to Automation**

In regards to Area 4, we note the inclusion of health issues associated with fatigue. While we appreciate the agencies' interest in the issue, we state unequivocally that the deployment of HAV and ADAS technology must not be used as an excuse to strip health and safety protections from workers. In any circumstance in which an operator is present, critical requirements like Hours of Service protections must not be abridged. DOT must not ignore the health of workers and their dignity in the workplace, because some duties may be able to be automated. We highly urge the agencies to not promulgate any recommendation to that effect.

Finally, we support DOT's statement that the study will engage affected stakeholders. It is our sincere hope that DOT and DOL will include robust labor participation in this outreach. The frontline working people represented by TTD's affiliated unions are an invaluable source of information on the issues the agencies are considering here, and it is imperative to recognize labor voices as the study moves forward.

We thank DOT for the opportunity to comment on the Statement of Work for its study on the Impact of Automated Vehicle Technologies on Workforce. We look forward to continuing to work with DOT and other federal agencies on issues surrounding automation.

Sincerely,

A handwritten signature in cursive script that reads "Larry I. Willis".

Larry I. Willis  
President



**Transportation Trades Department, AFL-CIO**  
*A bold voice for transportation workers*

***TTD MEMBER UNIONS***

Air Line Pilots Association (**ALPA**)  
Amalgamated Transit Union (**ATU**)  
American Federation of Government Employees (**AFGE**)  
American Federation of State, County and Municipal Employees (**AFSCME**)  
American Federation of Teachers (**AFT**)  
Association of Flight Attendants-CWA (**AFA-CWA**)  
American Train Dispatchers Association (**ATDA**)  
Brotherhood of Railroad Signalmen (**BRS**)  
Communications Workers of America (**CWA**)  
International Association of Fire Fighters (**IAFF**)  
International Association of Machinists and Aerospace Workers (**IAM**)  
International Brotherhood of Boilermakers, Iron Ship Builders,  
Blacksmiths, Forgers and Helpers (**IBB**)  
International Brotherhood of Electrical Workers (**IBEW**)  
International Longshoremen's Association (**ILA**)  
International Organization of Masters, Mates & Pilots, ILA (**MM&P**)  
International Union of Operating Engineers (**IUOE**)  
Laborers' International Union of North America (**LIUNA**)  
Marine Engineers' Beneficial Association (**MEBA**)  
National Air Traffic Controllers Association (**NATCA**)  
National Association of Letter Carriers (**NALC**)  
National Conference of Firemen and Oilers, SEIU (**NCFO, SEIU**)  
National Federation of Public and Private Employees (**NFOPAPE**)  
Office and Professional Employees International Union (**OPEIU**)  
Professional Aviation Safety Specialists (**PASS**)  
Sailors' Union of the Pacific (**SUP**)  
Sheet Metal, Air, Rail and Transportation Workers (**SMART**)  
SMART-Transportation Division  
Transportation Communications Union/ IAM (**TCU**)  
Transport Workers Union of America (**TWU**)  
**UNITE HERE!**  
United Mine Workers of America (**UMWA**)  
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service  
Workers International Union (**USW**)

*These 32 labor organizations are members of and represented by the TTD*

