



*A bold voice for transportation workers*

March 22, 2021

Office of the Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

**RE: Automated Vehicles Comprehensive Plan  
Docket No. DOT-OST-2021-0005**

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Department of Transportation's request for comments entitled Automated Vehicles Comprehensive Plan. TTD consists of 33 affiliate unions representing workers in all modes of transportation, including drivers and other ground transportation workers whose safety, security, and livelihoods have the potential to be seriously impacted by the rollout of automated technologies. We therefore have a vested interest in this policy.<sup>1</sup>

The Automated Vehicles (AV) Comprehensive Plan, released by the Trump administration on January 11, 2021, describes departmental goals related to automated driving systems (ADS), identifies actions being taken to meet those goals, and provides examples of how these actions relate to emerging ADS applications. The document is based on A.V. 4.0, which laid out DOT's approach to ADS technologies.

TTD strongly urges DOT to withdraw this comprehensive plan. Both the plan and the documents that led to its development—A.V. 3.0 and A.V. 4.0—fail to address safety, security, and workforce impacts of the implementation of ADS technologies. TTD previously filed concerns about DOT's approach to ADS in A.V. 3.0, in which the department abdicated its responsibility to protect workers and the public from the myriad documented safety problems associated with automated vehicles and failed to take serious steps to examine and mitigate the significant impacts that automated vehicles pose to the American workforce through deskilling and displacement.<sup>2</sup> We

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<sup>1</sup> Attached is a list of TTD's 33 affiliated unions.

<sup>2</sup> <https://ttd.org/wp-content/uploads/2018/12/Comments-AV-3.0-Docket-DOT-OST-2018-0149.pdf>

**Transportation Trades Department, AFL-CIO**

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Greg Regan, President / Shari Semelsberger, Secretary-Treasurer



filed further comments in response to A.V. 4.0, raising concerns that it failed to address A.V. 3.0's many shortcomings and continued to promote ADS implementation without common-sense, reasonable safeguards.<sup>3</sup>

The DOT has both the power and responsibility to assert its regulatory authority and oversight to ensure workers and the public are safe as we implement new technologies. As we expressed in our comments on A.V. 4.0, we believe that non-binding guidance and voluntary consensus standards are wholly inadequate to fulfill the department's responsibility to ensure safety and security in transportation. The department, under Secretary Chao's leadership during the Trump administration, stated that it supported "flexible, technology-neutral policies that will allow the public to choose the most economically efficient and effective transportation and mobility solutions." However, the public cannot make informed choices about technology and its safety if there are no mandated regulatory standards to compare technologies. Allowing self-regulated entities to make these standards themselves is a dangerous policy that should not be carried forward.

This comprehensive plan does nothing to advance the department's responsibilities to provide for public safety and further doubles down on the hands-off approach to allow industry to regulate itself. The document even provides that the department will assist the industry's efforts to *remove* crucial safeguards.<sup>4</sup> Instead of providing a safety-focused agenda, as has been asked for by NTSB following deadly safety failures, this comprehensive plan provides methods of expediting exemptions and waivers, removes reasonable barriers to AV deployment, and provides responsibility-free funding for ADS demonstrations and pilot projects.<sup>5</sup>

Further, the document fails to promote collaboration among stakeholders or even acknowledge the important role that frontline workers in the transportation and logistics sector can have in creating the safety that the public expects their government to provide. The lack of any formalized consultation plan to integrate the voices of workers reveals the document's disregard for workers, the critical safety role that they have, and the common-sense protection that they need. Moreover, the document entirely fails to recognize or explore ways to mitigate disruptions to the workforce caused by AVs. This plan sends a clear message that the safety of workers and their livelihoods are not a part of the previous administration's strategy for implementing new technology.

Any Comprehensive Plan for automated vehicles developed by the DOT must lay the groundwork for true regulatory oversight. The current document entirely fails to meet this standard; instead it turns over the authority to regulate to the industry itself. The documented history of AV safety concerns and their potential to disrupt millions of good American jobs demands a measured, comprehensive legislative and regulatory response. The DOT should go back to the drawing board in consultation with stakeholders representing all road users including drivers, pedestrians and

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<sup>3</sup> <https://ttd.org/wp-content/uploads/2020/04/AV-Comments-Automated-Vehicles-4.0.pdf>

<sup>4</sup> Page 11, Goal 2B

<sup>5</sup> <https://www.nts.gov/news/press-releases/Pages/NR20191119c.aspx>

bicyclists, retired persons, and persons with disabilities; representatives of the workforce that stand to be most impacted by ADS; experts in cybersecurity and data privacy; and others to develop a new plan that is truly comprehensive and accepts the regulatory responsibility held by the department.

For this reason, we urge this document to be withdrawn while the department develops a reasonable and responsible plan to ensure access to safe roads for everyone. We appreciate the opportunity to comment and look forward to working with the department going forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Regan', with a large, stylized flourish at the end.

Greg Regan  
President



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

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***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 (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 Automobile, Aerospace and Agricultural Implement Workers of America (UAW)  
United Mine Workers of America (UMWA)  
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service  
Workers International Union (USW)

*These 33 labor organizations are members of and represented by the TTD*

