



A bold voice for transportation workers

January 31, 2022

Robert Hampshire,
Deputy Assistant Secretary
Office of the Assistant Secretary for Research and Technology
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket No. DOT-OST-2021-0160

Dear Deputy Assistant Secretary Hampshire:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the U.S. Department of Transportation's (DOT) request for information on its (FY) 2022-2026 Research, Development, and Technology (RD&T) Strategic Plan. TTD consists of 36 affiliate unions representing workers in all modes of transportation, including those directly affected by the DOT's policies and programs. Specifically, the next wave of research initiatives funded by the agency as a result of the RD&T Strategic Plan will have a profound effect on the future of mobility, work and jobs in this industry. We therefore have a vested interest in the results from this important proceeding.¹ We also want to concur with the separate comments submitted by the Transport Workers Union, a TTD member union.

At the outset, we want to praise Transportation Secretary Pete Buttigieg for the worker-centered policy commitments embodied in the recently unveiled Innovation Principles. This new approach to innovation marks a powerful paradigm shift in the Department's assessment of transportation research and deployment of technology.² TTD applauds the centering of workers and their right to have a union voice in these principles, and agrees that the people on the frontlines of our passenger and freight transportation systems must have a "seat at the table" in shaping innovation. The next

¹ Attached is a list of TTD's 36 affiliated unions.

² TTD President Greg Regan statement in support of DOT Innovation Principles: <https://ttd.org/news-and-media/press-releases/dots-innovation-principles-are-a-victory-for-transportation-labor/>.

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Greg Regan, President / Shari Semelsberger, Secretary-Treasurer



Research, Development, and Technology Strategic Plan should reflect these Principles and honor the commitments of the Biden-Harris Administration to create high quality union jobs, achieve racial equity, and increase opportunity for all Americans.³

Aside from the principle of supporting workers, the Department also committed to “provide opportunities to collaborate” in its Innovation Principles. While DOT’s RD&T programs have long celebrated partnership and coordination with corporations, governments, and academia, workers and unions have largely been left out of the research and policy work the agency funds and counts on for assessments and recommendations about the future of transportation innovation.

The transportation workforce is deeply impacted by the downstream outputs of DOT’s and the entire federal government’s vast research investments, and therefore should be formally represented upstream in the process. If given a formal role in the innovation ecosystem, workers and their unions can provide their rich experience to technology research projects, shape their direction and produce better outcomes for the country. No conversation concerning transportation safety, security, automation or equity is complete without the input of transportation workers. In order to faithfully integrate the Innovation Principles, DOT must reorient the RD&T program from top to bottom and commit to mainstreaming worker voice as a matter of explicit policy.

First, DOT must codify the creation and retention of good jobs as a strategic goal of its research efforts. For too long, DOT has fostered the development of new transportation technologies and worked to accelerate their integration into our transportation system⁴ without meaningful regard for the affected workforces. For example, the breakneck pace of the rollout of automated vehicle pilot programs onto our roadways has carried numerous safety risks and may later degrade the wages and bargaining power of millions of transportation workers. We believe that safety and equity goals are better served by inviting workers and their representatives to be partners in innovation, establishing high standards for safety in automation and directing RD&T funds toward good job creation and workforce training and preparedness. Of particular necessity are requirements that workers whose current jobs would be replaced or substantially changed by implementation of new technology should be adequately trained on the new technology and have priority in filling positions utilizing the new technology. Unions representing those workers should participate in setting the terms of training and transition to new jobs. TTD believes DOT’s RD&T efforts, if directed appropriately, can produce valuable ideas for retaining a strong middle class workforce across all modes of our future transportation system, thereby ensuring broadly shared prosperity for the country.

Second, workers’ voices should be formally incorporated into the DOT’s investments in RD&T. The current research approach results in DOT funding and collaborating with stakeholders including employers and then transferring many breakthroughs from that research into the

³ US DOT Innovation Principles: <https://www.transportation.gov/priorities/innovation/us-dot-innovation-principles>

⁴ <https://www.transportation.gov/sites/dot.gov/files/2020-11/DOT%20RDT%20Strat%20Plan%20-%20112320%20-%20Final.pdf>

marketplace. It is important to note that these publicly funded projects have incubated technologies that companies have later capitalized on, but have left workers' interests on the sidelines. Formalized input from workers and their unions can better orient RD&T investments to ensure they achieve broad public benefits. But for this to occur, the DOT and the Biden Administration must reboot its research and innovation policies and investments to focus on US job creation and share prosperity instead of scrambling as we do today to mitigate worker de-skilling and displacement often caused by poorly planned and developed new technology deployments..

Lastly, incorporating the goals of supporting workers, inviting collaboration, and championing safety and equity will necessitate a thoughtful review and assessment of the DOT's RD&T processes and existing research activities. It is not enough to apply these goals to future research endeavors; the DOT must reorient its apparatus today towards the inclusion of worker perspectives and the evaluation of projects with the welfare of transportation workers in mind. The DOT holds significant power in shaping transportation technology – often spawning new markets – and determining the future of both the public and private transportation sectors and their employees. The Department's existing research and development work is too impactful and we welcome this important policy reboot.

We look forward to working with you to redirect the agency's RD&T programs toward broad public benefits including the creation of good, union jobs. We are committed to bringing the voices of transportation unions and their skilled members to the conversations you lead over the future of the DOT's research and development enterprise.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Regan', written in a cursive style.

Greg Regan
President