



A bold voice for transportation workers

September 22, 2022

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Buttigieg:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am writing to express deep concern about the U.S. Department of Transportation's (DOT) approach toward the deployment of poorly regulated and potentially disruptive new technologies in our transportation system. We are concerned about the absence of an existing policy framework that ensures those technologies will meet the promises of safety, good jobs, equity, and other key policy outcomes. While DOT's [Innovation Principles](#) outlined a commitment to empowering workers, we have yet to see the DOT reflect that commitment in its policy decisions regarding technologies that have the potential to displace or deskill millions of workers and subject end users to safety risks.

Most recently, this oversight was demonstrated in the Notice of Funding Opportunity (NOFO) for the Strengthening Mobility and Revolutionizing Transportation (SMART) Grants announced this week. As you know, this program will invest \$500 million over the life of the Bipartisan Infrastructure Law into technologies that, on their own, carry no guarantee of creating good jobs or meeting the other policy goals established in the DOT's Innovation Principles. While the DOT has demonstrated a remarkable commitment to ensuring good jobs, safety, and equity in its evaluation criteria for several other grant programs this year, the SMART grant fails to require applicants to seriously consider workforce impacts and retraining needs. This is a troubling oversight from an administration that has thus far demonstrated a clear commitment to the preservation and creation of good union jobs.

Although we were pleased to see the prioritization of high-quality job creation in the NOFO for the Federal Highway Administration's Advanced Transportation Technology and Innovation (ATTAIN) program, the fact that ATTAIN makes up only \$60 million of the \$160 million [made available](#) on Monday illustrates our broader concern.

Transportation Trades Department, AFL-CIO

815 Black Lives Matter Plaza, NW / 4th Floor / Washington DC 20006
Tel: 202.628.9262 / Fax: 202.628.0391 / www.ttd.org
Greg Regan, President / Shari Semelsberger, Secretary-Treasurer



Transportation labor has made clear our commitment to working collaboratively with this administration to usher in new technologies in a way that meets the core objectives of your Innovation Principles, which we endorsed. Most recently, we [provided detailed comments](#) to the Federal Transit Administration (FTA) supporting a worker- and safety-first agenda in transit automation research. In fact, TTD has a long history of [testifying before Congress](#), crafting [policy principles](#), and submitting [detailed federal comments](#) that offer a clear and constructive framework for how innovation and good jobs can go hand in hand and meet the goals of this administration’s Innovation Principles.

Yet, the continued absence of a clear policy framework that builds on the DOT’s own Innovation Principles or an overhaul of the Trump Administration’s Autonomous Vehicles Comprehensive Plan reflects a broader pattern in which serious concerns regarding safety, equity, and workforce impacts are swept aside for the sake of rapid adoption of new technology. I assure you, transportation labor stands ready to adapt and embrace change, but we must not let the promise of technological advancement lead us away from values I know you and President Biden hold: that federal transportation investments must be equitable and accessible, affordable, reliable, safe, and uphold high-road labor models that create and sustain high-quality jobs. DOT’s investments should never undermine workers through hasty sponsorship of labor-replacing technologies or low-road employment models.

We ask that you immediately live up to your previous commitments by implementing the Innovation Principles across the board. The AV 4.0 plan, the SMART Grant NOFO, and all other funding opportunities that support potentially disruptive technologies must be clarified to start actualizing the Innovation Principles. Moreover, I hope your Department will engage in further dialogue with TTD and our affiliated unions on ways to deploy innovation that uphold DOT’s commitment to give workers a “seat at the table” – as stated in the Innovation Principles framework – and addresses the realities of how automation and other innovative transportation technologies will impact the workforce in this country.

Thank you for your consideration.

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

Greg Regan
President