

March 20, 2026

Michael A. Halem
Acting Assistant Secretary for Research and Technology
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

**RE: Request for Information-Research To Support Establishing a National Strategy for
Transportation Digital Infrastructure
Docket No. DOT-OST-2026-0430**

Mr. Halem:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Department of Transportation's (DOT) request for information regarding research to support establishing a national strategy for transportation digital infrastructure (TDI). By way of background, TTD is America's largest transportation labor federation, representing unions whose members work in all modes of transportation. As such, we have a vested interest in the development of a national strategy for transportation digital infrastructure.

Transportation labor unions have fought for decades to ensure that federal investments made in America's transportation infrastructure are tied to strong policies that support and create good jobs and safe and equitable workplaces for America's workers. The DOT's investments should never undermine workers through hasty sponsorship of labor-replacing technologies.

In some sectors of our transportation system, the tools and processes for managing technological change are well established and are already managed through collective bargaining agreements, registered apprenticeships, joint labor-management partnerships, or through other existing frameworks. To that end, the DOT must take care to ensure that existing collective bargaining agreements are honored and upheld amidst any deployment of automated technologies.

A. Research, Development and Deployment

1. How should Transportation Digital Infrastructure be defined?

The DOT must be clear and direct when defining Transportation Digital Infrastructure. It is critical that the established definition of this term be narrowly construed in order for the DOT to develop a framework for TDI research that is capable of mitigating worker de-skilling and displacement, and creating and retaining good jobs. A clear definition also helps DOT ensure that goals can be tracked and measured.

Currently, the DOT's Intelligent Transportation Systems Joint Program Office defines the term 'digital infrastructure' as, "collective public and private technology assets that create, exchange, or use data or information to improve the transportation system by the provision of existing and new services for travelers, businesses, and agencies."¹ In order to construct achievable goals for this research, the DOT must narrow this definition. At the core of any future TDI framework, the DOT's primary focus must be the safety and security of the transportation system in addition to worker rights, safety, and privacy.

2. What TDI research needs should be prioritized?

We strongly encourage the DOT to thoughtfully consider the workforce impacts of any technologies related to TDI, particularly the downstream impacts on frontline workers. The DOT should collect robust and sound data on the impact that the introduction of new techniques and technologies will have on the workforces that will be necessary to maximize their societal benefits.

At a minimum, the federal government should, in consultation with affected labor organizations, collect strong statistical data that analyzes:

- Skills gaps of the current public and private sector transportation workforce;
- The education and recruitment of technical workers in the transportation industry with respect to Artificial Intelligence (AI);
- The state of AI use in the transportation sector, including deployment timeframes across transportation sectors;
- The capacity of the DOT and modal administrations to address issues of workforce impacts, economic impacts, and worker readiness, and the capability of modal administrations to conduct necessary oversight with respect to the development and use of AI in the transportation industry;
- The impact of AI on the transportation workforce, including whether job tasks are being shifted from trained workers to untrained individuals, and whether human workers are at risk for skill atrophy;
- The anticipated impact of AI on all aspects of the transportation workforce, including, at a minimum, AI adoption, work intensification, job creation, job quality, displacement, retention, job training and evaluation, and wage and benefit effects; and
- Whether the prioritization of applications for DOT grants that explicitly consider workforce and worker impacts, expand access to skills and training, and involve the impacted workforce shaping innovation would address workforce impacts of AI in the transportation sector.

Following these analyses, the DOT should work with organizations representing frontline workers to formulate solutions to address skill gaps, including consideration for reskilling workers and using registered apprenticeship and pre-apprenticeship programs. In working in partnership with organizations representing frontline workers, the DOT should also consider how to address the challenges and

¹ <https://www.its.dot.gov/research-areas/Digital-Infrastructure/>

opportunities revealed by the data, including how the Secretary, in consultation with the Department of Labor, could address these challenges and opportunities.

4. Are there existing testbeds, pilots or demonstrations that could be leveraged?

We encourage the DOT to ensure that technological pilots and test programs are accompanied by public data sharing. To that end, the DOT should provide the public with the opportunity to evaluate the testing procedures, safety protocols, software deployment, and data collected throughout the testing process and allow for the submission of public comments. Public comment periods provide a meaningful due process that allows the public and stakeholders to weigh in on important issues and thus are a core tenet of the Administrative Procedure Act. We also recommend that organizations representing frontline workers be part of the development of these pilots and test programs to ensure technology develops alongside workers and that their firsthand experience is considered.

C. Artificial Intelligence and Automation

1. How should AI applications be leveraged to support TDI development and deployment?

We strongly caution the DOT against the deployment of autonomous technologies without proper testing, data collection, and formal rulemakings that establish guardrails for the potential integration of these technologies into the transportation system. Moreover, autonomous technologies should never be leveraged to replace the existing workforce. Many existing transportation regulations were precipitated by tragic accidents and incidents, and were put in place to correct safety deficiencies. Any changes to these hard-won regulations must be undertaken through the process outlined in the Administrative Procedure Act, which requires that the public have the opportunity to view and provide meaningful comments on proposed changes.

2. How should TDI be best used to accelerate the development and deployment of autonomous vehicles, drones and other transformative technologies?

Again, we must urge the DOT to cautiously approach the development and deployment of autonomous technologies. These technologies must be thoroughly tested and data must prove that the addition of autonomous technology is as safe, or safer, than current practices. Moreover, autonomous technologies should never be leveraged to replace the existing workforce.

Additionally, some autonomous technologies and their potential integration into the transportation system are currently the subject of ongoing rulemakings. This process should not be accelerated.

D. Data Governance, Privacy, and Cybersecurity

1. What data governance principles, access controls, and cybersecurity measures are needed to ensure trust, accountability, and privacy?

Following the technological testing phase, which should involve public data sharing, any integration of new technology should be accompanied by strict data protection and privacy protocols. The collection, use, storage, and sharing of data should be strictly limited to only that which is necessary for achieving the project and should not be used to monitor a worker or in consideration of an adverse action against a

worker. Workers should be permitted to review and correct any discrepancies in data. Workers should also be permitted to opt-out of having their data shared with a third party.

Additionally, we support establishing strong cybersecurity measures for new digital infrastructure technologies. The DOT should take care to evaluate potential security vulnerabilities prior to the integration of new technologies, as an attack or malfunction can have crippling consequences.

Conclusion

Transportation labor unions have fought for decades to ensure that federal investments made in America's transportation infrastructure are tied to strong policies that support and create good jobs and safe and equitable workplaces for America's workers. The DOT's investments should never undermine workers through hasty sponsorship of labor-replacing technologies or low-road employment models.

We appreciate the opportunity to respond to this request for information and look forward to working with the DOT in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Regan", enclosed within a circular stamp or seal.

Greg Regan
President