

Motor & Equipment Manufacturers Association

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February 18, 2020

Kelly Regal
Associate Administrator for Office of Research and Information Technology
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

**Re: Agency Information Collection Activities; New Information Collection:
Beyond Compliance [Docket No. FMCSA-2018-0328]**

Dear Ms. Regal:

The Motor & Equipment Manufacturers Association (MEMA) represents more than 1,000 companies that manufacture and remanufacture motor vehicle parts, components, and systems for use in the light- and heavy-duty vehicle original equipment and aftermarket industries. Our members provide more than 871,000 direct jobs, making the motor vehicle parts industry the largest sector of manufacturing jobs nationwide. Our members lead the way in developing advanced, transformative technologies that enable safer, smarter, and more efficient vehicles, all within a rapidly growing global marketplace with increased regulatory and consumer demands.

MEMA applauds the Federal Motor Carrier Safety Administration (FMCSA) for continuing to take steps to implement the program mandated in the Fixing America's Surface Transportation (FAST) Act that encourages fleets to go beyond minimum requirements in the law. This "Beyond Compliance" program will encourage fleets to voluntarily purchase, install and deploy advanced safety technologies and fleet management systems for commercial vehicles. Advanced safety technologies that focus on crash avoidance and mitigation will contribute significantly to reducing heavy vehicle-related fatalities and injuries. Beyond Compliance will allow fleets to address their specific needs in a cost-effective manner without creating new federal mandates or requirements.

As FMCSA collects information from fleets, MEMA also encourages FMCSA to seek information from motor vehicle suppliers about the technology solutions available to fleets to improve vehicle safety. There are a number of systems currently in production and commercially available. The success of these systems is demonstrated and supported by independent, substantive data. Examples of safety systems that should be considered for inclusion in a Beyond Compliance program include brake stroke monitoring systems, lane departure warning (LDW) and blind spot detection systems, automatic emergency braking (AEB) systems, trailer-based stability control systems, electronic stability control systems (ESC), driver monitoring, and electronic logging devices (ELDs). These systems have proven successful in reducing the risk of many of the crashes and crash causes identified in FMCSA's Large Truck Crash Causation Study (LTCCS).

The Beyond Compliance proposal provides a program that allows fleets and owner-operators to take steps to make their vehicles and drivers safer. It would promote the voluntary adoption of nonregulatory solutions by private industry to enhance their safety performance and to have the federal government formally recognize these proven solutions through incentives.



MEMA Comments on Beyond Compliance

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MEMA strongly supports the creation of a Beyond Compliance program. There are a wide variety of existing, evolving and emerging technologies – all with tangible safety benefits – that should be eligible under such a program. MEMA urges FMCSA to continue moving forward in implementing the Beyond Compliance program which will improve heavy-duty vehicle and fleet safety.

For questions or more information, please contact Catherine Boland, MEMA vice president, legislative affairs, at 202-312-9241 or cboland@mema.org.

Regards,

A handwritten signature in black ink that reads "Ann Wilson". The signature is written in a cursive style with a long horizontal stroke at the end.

Ann Wilson
Senior Vice President
Government Affairs