



## Owner-Operator Independent Drivers Association

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### Suggested Talking Points for Commenting on Proposed Speed Limiter Rule

On September 7<sup>th</sup>, the FMCSA along with the National Highway Traffic Safety Administration published a Notice of Proposed Rulemaking that would mandate new heavy-duty vehicles to be equipped with speed limiters. OOIDA is opposed to mandatory speed limiters because they are dangerous for all highway users. The federal proposal is based on unfounded data that will likely detract from highway safety. In actuality, highways are safest when all vehicles travel at the same relative speed.

OOIDA encourages its members to submit comments via [www.regulations.gov](http://www.regulations.gov) at [Docket # FMCSA-2014-0083](#) or [Docket # NHTSA-2016-0087](#) (All comments received will be duly considered by the joint NHTSA and FMCSA team, comments only need to be posted to 1 docket). The public comment period will be open until Wednesday, December 7<sup>th</sup>.

- Proponents of speed limiters have claimed that speed limiting trucks will make highways safer, but this is not supported by related research. Studies show that a higher variance of vehicle speeds in traffic flow increases the risk of an accident
- The frequency of interactions with other vehicles by a vehicle traveling 10 mph below the posted speed limit is 227% higher than when moving at traffic speed. More interaction of vehicles leads to greater chance of accidents.
- The vast majority of all accidents occur on roadways or in certain areas of highways, such as in cities or construction zones, where the posted speed limit is less than the proposed speed limiter settings (60, 65, or 68 mph). The majority of speed-related truck crashes occur while driving too fast for conditions, not exceeding the posted speed limit.
- The proposal does not ever claim to be about reducing or eliminating crashes, but instead aims to reduce crash severity. While that is a laudable goal, the approach the Agencies are taking is certain to increase the number of crashes between cars and trucks because of speed differentials.
- DOT Secretary Anthony Foxx has touted that speed limiters *could* save an estimated \$1.1 billion in fuel costs and millions of gallons of fuel annually, but actual research is basically non-existent. Owner-operators are familiar with the “sweet spot,” where the engine runs the most efficient at a higher speed. With speed limiters, the same trucks will now have to run at less than their optimal efficiency and get poorer fuel mileage. Fuel efficiency is not gained by simply slowing down trucks, but how the entire drive-train, gears, and tires are synced together.

- The proposal argues that speed limiters are necessary in order to achieve fuel savings and reductions in greenhouse gas emissions (GHGs). But in fact under speed limiters, more trucks will be needed to deliver the same amount of freight, thus using more fuel and emitting more GHGs. Additionally, other vehicles will be speeding up to pass trucks and thereby using more fuel.
- Speed limiters take control of the truck out of the driver's hands. There are countless scenarios where drivers must speed up to avoid accidents, but this would not be possible with speed limiters.
- Rather than mandating speed limiters, the most efficient and cost-effective means to promote safer roads is simply to enforce existing speed limits, which Congress authorized states to set based on their own unique factors.
- If you drive or have driven a speed limited truck, express your personal experiences and the real-world, on-the-road problems they create. We are hearing from plenty of drivers who have driven speed limited trucks or driven in speed limited areas about how dangerous speed limiters can be.