



Motor Carrier Safety Research Analysis Committee (MCSRAC) Letter Report Findings

FMCSA's R&T division is responsible for providing data, statistics, and systematic studies, as well as identifying, testing, and supporting technology transfer activities and deployment of commercial motor vehicle safety technologies. The R&T must observe strict scientific integrity as its findings impact the entire trucking industry. The MCSRAC was created from the National Academies of Sciences by the FAST Act to promote integrity and transparency in FMCSA R&T activities and to assist the Agency in refining its research methodologies.

What the MCSRAC found:

- R&T staff was concerned if they were doing the right things in the right areas
- R&T staff have been more focused on supporting internal customers, such as program managers and regulators, and supporting enforcement than finding the "cause of crashes"
- Resulting R&T projects include important safety concerns but appear to lack an integrating principle
- R&T tends to focus on singular causes of a crash, such as fatigue, instead of examining multiple contributing factors, and attempts to assign a "critical reason" for a crash. However, focusing on the "critical reason" for a crash may obscure effective countermeasures.
- The Agency ignores its own data and targets Interstates for a majority of enforcement when evidence demonstrates that most fatal crashes occur on state roads and highways
- The Agency must examine environmental factors, traffic levels, vehicle technologies, and roadway design when researching factors that lead to a crash
- The Agency must broaden its view and consider crash risk more holistically rather than focus on one factor (e.g., fatigue) as the primary cause

- MCSRAC is concerned with the lack of relevant data in the Agencies research, thus the committee did not recommend *new* data but *relevant* data

Specifics on Safety Research Methods:

- Much of the data used by the Agency is subject to bias
- The Agency must collect data in a manner consistent with federal standards and the protocol established through the data.gov program
- FMCSA relies heavily upon naturalistic driving studies (NDS) to evaluate the behavior of drivers while they are on the road. However, NDS are incredibly limited due to the fact that crashes are rare events and are frequently biased.
- NDS rely upon safety critical events (SCEs) as a proxy to crashes. However, assuming that a SCE is a suitable proxy for a crash lacks any scientific validation. A closer examination of the relationship between SCEs and actual crash risk is needed in order to validate them as appropriate proxy measures.
- The committee asked the FMCSA, “[w]hat is the standard of proof for a proxy measure as an indicator of crash risk?”
- The Agency’s concentration on meeting internal needs has contributed to a confirmation bias within their research, meaning that a conclusion is already assumed and a study is therefore designed to support said conclusion
- FMCSA must publish their findings in peer-reviewed journals because; “Hours-of-Service and other areas of safety regulation are highly contentious, data are incomplete, and consensus is lacking about standards of evidence for certain kinds of studies.”

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