

**Motor Carrier Safety Advisory Committee (MCSAC) Discussion Notes**  
**Task 20-1: Small Trucks and Their Impact on Safety**

In Task 20-1, the Federal Motor Carrier Safety Administration (FMCSA) directed MCSAC to provide recommendations to the Agency regarding changes to the package and small goods delivery sector and the potential safety impacts of these unregulated drivers and vehicles. FMCSA asked MCSAC to enumerate and elaborate on any resulting benefits or negative consequences that may arise from their use in interstate commerce. Agency experts briefed the committee on trends in Federal crash and highway safety data. The analysis, focused on smaller unregulated delivery trucks and FMCSA-regulated vehicles weighing 10,000-14,000 pounds, aimed to increase understanding of the prevalence of use and safety impacts of small trucks in “last mile” type deliveries. Of particular interest to the committee is the safety impacts of smaller truck and their prevalence in interstate commerce.

**I. Discussion About Small Trucks and Their Impact on Safety**

- A. The coronavirus pandemic has caused a cultural shift.
  - 1. Carriers began adding smaller trucks prior to the pandemic in 2020.
  - 2. Industry increasingly relies on e-commerce and use of small vehicles for last-mile deliveries.
  - 3. 2020 statistics may show a higher crash rate for smaller vehicles.
  - 4. Preliminary data for 2019 is forthcoming.
- B. FMCSA Office of Research presented data from the Fatality Analysis Reporting System (FARS) and Motor Carrier Management Information System (MCMIS).
  - 1. Additional data and targeted breakouts are needed.
  - 2. FARS and MCMIS data may not capture the whole picture of a crash; i.e. it may not indicate that it was a last mile delivery, etc. Thus, FARS and MCMIS may not provide enough data to really understand what is happening with these <10,000 lbs. trucks.
  - 3. MCSAC would like to see more specific data concerning driver impairment, with breakout of commercial driver’s license (CDL) type, truck class, injury and property-damage-only crashes, pedestrian involvement, etc., including those vehicles weighing less than 10,000 lbs.
  - 4. The Occupational Safety and Health Administration (OSHA) may have data on workplace injuries.
  - 5. Smaller vehicle data should be stripped beyond FMCSA-reportable guidelines.
  - 6. Data from intrastate carriers vary and may require obtaining different datasets from each State.
- C. Are these unregulated vehicles or drivers involved in fatal crashes or serious injuries? Is it disproportionate to the industry as a whole? If so, there may need to be countermeasures or regulatory strategies at the Federal or State levels. If not, we may be satisfied and feel no action need be taken.
- D. Need to determine exactly what the lighter vehicles are and who their drivers are. FARS data does not cover that.
- E. How do we compare this data with other vehicles, like cars? Are many accidents happening with the cars also, or just trucks? What kind of trucks?

- F. Is there an impact on traffic at certain times of day, i.e. when vehicles are exiting warehouses? During high peak times; morning/afternoon commutes?
- G. Regulatory loophole/gap – who regulates these vehicles? Is regulation necessary?
- H. Do we have data from trucks with in-cab cameras? As those carriers are not required to report the info to FMCSA, we would get the data from MCMIS and FARS.
- I. Uptick in crashes of 10,000 – 14,000 lbs. vehicles. If used in interstate commerce, they have a DOT number, but if intrastate, they do not. There is a gap in regulations. States may not have intrastate regulations.
- J. For trucks or large vans used for local commercial use, are there different trends in crash statistics than in for last mile delivery, etc.? How are these vehicles being used? Who is using them?
- K. Have we reached out to these companies?

## **II. Action Items**

- A. Conduct a new fatality data run of vehicles weighing 6,001-10,000 lbs. in FARS, regardless of how the vehicle is coded, large or small. The July 2021 FMCSA Office of Research FARS presentation provided a breakout of vehicles coded as trucks <10,000 lbs., satisfying this requirement.
- B. Obtain injury and property damage information from the National Highway Traffic Safety Administration's (NHTSA's) Crash Report Sampling System, for vehicles in the 6,001-10,000 lbs. range. It will be necessary to verify the data can be broken out that way.
- C. Identify and survey nine States that have the injury and property damage dataset to delve deeper into that category. The Designated Federal Officer (DFO) indicated that FMCSA has not yet identified nine States but can start with the States that have datasets, especially on 6-10,000 lbs. range.
  - 1. Need better picture of how these States are regulating the vehicles under 10,000 lbs.
  - 2. The State Programs Division has a list of State compatibility rules, which can be used to see what weight thresholds each State is using.
  - 3. It is important that it is nine States due to Paperwork Reduction Act requirements. If the number were to go above a certain threshold, MCSAC would need to get approval from the Office of Management and Budget (OMB), publish a Federal Register Notice, seek public comment, etc.
- D. Identify specific companies that use vehicles in the 6,001-10,000 lb. category (e.g., Amazon, UPS, FedEx) and their best practices for safety oversight.
  - 1. Amazon has a range of CMVs—some may be above and some below 10,000 lbs.—the same size as UPS and smaller.
  - 2. Suggest a presentation for the December 2021 meeting.
  - 3. Suggest a presentation from JJ Keller on what they are doing to help the delivery van drivers develop safe driving habits.

- E. Potentially reach out to OSHA, State Highway Administrators, National Institute for Occupational Safety and Health, National Safety Council, Transportation Research Board (TRB), and the American Association of State Highway and Transportation Officials to obtain data on workplace injuries/crashes as they relate to workers and drivers of smaller trucks.
- F. Consult local police departments, or other State resources, on how many accidents, time of month/season, conditions of drivers, where most accidents are happening, etc.
- G. Research the New Entrant Program to identify applicants for interstate DOT numbers with trucks weighing less than 10,001 lbs.
  - 1. 40-50,000 new entrant carriers a year; registration form does not cover vehicles less than 10,000 lbs. Carriers may have some less than 10,000 lbs., but the information they report is for vehicles 10,000 lbs. and above.
  - 2. As a reminder, any new regulations will affect labor directly and will cost more money. Must consider how this will affect businesses.
  - 3. Some companies have a DOT number but during a safety audit, it appears all their trucks are below 10,000 lbs.
  - 4. State Departments of Motor Vehicles (DMVs) may impose compliance requirements as a condition of registration. American Association of Motor Vehicle Administrators (AAMVA) may be an additional source of information.
- H. How are small truck drivers being paid? Is it by the hour, by number of deliveries, or by the mile?
- I. Need to determine if data on small truck drivers exists.