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May 9, 2023

Shannon L. Watson
Designated Federal Officer, WOTAB
Federal Motor Carrier Safety Administration (FMCSA)
1200 New Jersey Avenue SE
Washington, D.C. 20590

Re: Public Comments for Women of Trucking Advisory Board (WOTAB) Public Meeting
(Docket No. FMCSA-2022-0209)

Dear Ms. Watson:

I am writing on behalf of the National Women's Law Center to submit a public comment for the Federal Motor Carrier Safety Administration's (FMCSA) Women in Trucking Advisory Board (WOTAB) meeting scheduled for May 16, 2023. The National Women's Law Center has worked for fifty years to advance and protect women's equality and opportunity—with a focus on women's employment, education, income security, health, and reproductive rights—and has long worked to remove barriers to equal treatment of women in the workplace, especially for women of color, LGBTQI+ people, and low-income women and families.

We write to express our support for the work of WOTAB and its goals of addressing the barriers facing women in trucking and identifying the challenges that discourage or otherwise limit the number of women in trucking. We believe quality research and data will be critically important to inform WOTAB's work as it moves forward in implementing its statutory responsibilities. As such, we write to express concern with the methodology, findings, and recommendations in the recently released "Crime Prevention for Truckers Study" (FMCSA-RRT-22-002), that WOTAB will continue reviewing during its May 16, 2023, meeting.

In particular, we are concerned that the report relied on a survey that failed to gather or provide sufficient data to understand the experience of sexual harassment and assault, especially for women of color and for truckers who identify as LGBTQI+. We also have concerns regarding the recommendations themselves, which relied entirely on one informal survey question that did not specify which issues survey participants were being asked to address. As a result, the recommendations are incomplete, unreliable, and potentially harmful, especially as no data was presented on which survey participants made which recommendations, or why. At least one recommendation—allowing firearm carrying—could result in even greater danger of assault.

While we appreciate the FMCSA's recognition of the need for research to best fulfill the mandates of WOTAB, we urge the board to seek additional research that provides a more comprehensive picture of the issue of sexual harassment and assault in the trucking industry and how it can best be prevented.

We look forward to partnering with WOTAB on issues concerning gender-based violence in trucking, unlawful discrimination, including sexual harassment, and other barriers to employment that may be identified during this process.

Sincerely,



Emily Martin
Vice President for Education & Workplace Justice
National Women's Law Center



Adrienne DerVartanian
Senior Counsel, Education & Workplace Justice
National Women's Law Center