



September 23, 2015

To: AASHTO
Committee on Highway Transport
Attention: Mr. Chris Smith

To: AASHTO
Committee on Highway Transport - Harmonization
Attention: Mr. Randy Braden

To: WASHTO
Committee on Highway Transport
Attention: Mr. Jim Wright

To: SASHTO
Committee on Highway Transport
Attention: Mr. Wayne Davis

To: NASHTO
Committee on Highway Transport
Attention: Mr. Matt Hedge

To: MAASHTO
Committee on Highway Transport
Attention: Mr. Ted Coulianos

Reference: Oversize Load Signs for Pilot/Escort Vehicles
NTSB Recommendation concerning Crash Avoidance Systems

Dear Committee Chairmen,

With advancements in technology that address various safety aspects of vehicles and the drivers of these vehicles, Crash Avoidance System technology has advanced considerable since its inception in 1998. This technology is becoming very reliable and recently, the National Transportation Safety Board published a recommendation concerning Crash Avoidance Systems.

This is an excerpt from a recently published article within the insurance industry "Claims Journal":

NTSB Calls for Collision Avoidance Systems to be Standard on All Vehicles
June 17, 2015

In a report released last week, the National Transportation Safety Board outlined the life-saving benefits of currently available [collision avoidance systems](#), and recommended that the technology become standard on all new passenger and commercial vehicles.

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"You don't pay extra for your seatbelt," said Chairman Christopher A. Hart. "And you shouldn't have to pay extra for technology that can help prevent a collision altogether."



Ford Pre-Collision Assist with Pedestrian Detection Technology, available new technology from Ford is designed to reduce the severity of and, in some cases, even eliminate frontal collisions involving pedestrians. Debuting on the 2015 Ford Mondeo in Europe, the system provides a collision warning to the driver and, if the driver does not respond in time, can automatically apply the vehicle brakes.

NTSB's Special Investigation Report, *The Use of Forward Collision Avoidance Systems to Prevent and Mitigate Rear-End Crashes*, stresses that collision avoidance systems can prevent or lessen the severity of rear-end crashes, thus saving lives and reducing injuries.

According to statistics from the National Highway Traffic Safety Administration (NHTSA), rear-end crashes kill about 1,700 people every year and injure half a million more. More than 80 percent of these deaths and injuries might have been mitigated had the vehicles been equipped with a collision avoidance system.

The NTSB has made 12 recommendations over 20 years in favor of forward collision avoidance technologies, including 10 recommendations resulting from an earlier Special Investigation Report in 2001.

The progress on these recommendations, however, has been very limited. The report notes that a lack of incentives and limited public awareness has stunted the wide adoption of collision avoidance technology.

Only four out of 684 passenger vehicle models in 2014 included a complete forward collision avoidance system as a standard feature. When these systems are offered as options, they are often bundled with other non-safety features, making the overall package more expensive.

"The promise of a next generation of safety improvements has been used too often to justify inaction," Hart said. "Because there will always be better technologies over the horizon, we must be careful to avoid letting perfection become the enemy of the good."

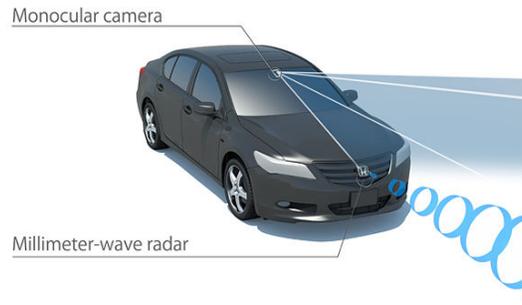
In the report, the NTSB recommends that manufacturers make collision avoidance systems standard equipment in newly manufactured vehicles, beginning with collision warning systems, and adding autonomous emergency braking once NHTSA completes standards for such braking systems.

Furthermore, the NTSB recommends that NHTSA develop tests and standards in order to rate the performance of each vehicle's collision avoidance systems and to incorporate those results into an expanded NCAP 5-star safety rating scale.

The NTSB is also issuing a companion Safety Alert for consumers and commercial fleet owners that urges them to consider vehicles with collision warning and autonomous emergency braking functions.

Today, each vehicle manufacturer is deploying these systems using different and varying equipment and technologies. Some are using systems that are located behind the windshield while other systems are being installed in the front bumper or grille or both.

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Rear Bumpers also have sensors being deployed to address backing and parking issues.



During the past couple of years in the various regional transportation meetings there has been considerable discussion concerning the standardization of various aspects and issues surrounding the movement of OSOW vehicles. During the “Phase 1 Harmonization”, it was discussed and a suggested standard for the “Oversize Load” signs was defined. There was also discussion relating to the location of these signs on the Pilot/Escort vehicles.

During these discussions concerning the locations of the signs for the Pilot/Escort vehicles, it was noted that some States required bumper mounted signs, some States required top mount signs and some States would accept both.

The language within the Harmonization Phase 1 that has been agreed and is being suggested to all States DOES NOT define the location of the sign on the Pilot/Escort vehicle, just the suggested size of the sign and the wording.

The following list is an overview of how the States define the location of the “Oversize Load” signs for the Pilot/Escort vehicles.

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Require Bumper Mount Signs	Accept Bumper Mount Signs	DO NOT Accept Bumper Mount Signs
Alabama	Alaska	Arizona
Georgia	Arkansas	Colorado
Indiana	California	Connecticut
Iowa	Delaware	Idaho
Kentucky	Florida	Maryland
Massachusetts	Illinois	Michigan
Missouri	Kansas	Minnesota
Nebraska	Maine	Montana
New Hampshire	Mississippi	Nevada
New Jersey	New Mexico	North Dakota
Pennsylvania	New York	Oregon
Rhode Island	North Carolina	Utah
South Carolina	Ohio	Washington
South Dakota	Oklahoma	Wisconsin
Vermont	Tennessee	
	Texas	
	Virginia	
	West Virginia	
	Wyoming	

With these recent recommendations by NTSB and because the vehicle manufacturers are already deploying “Crash Avoidance Systems”, I would strongly suggest that an immediate revisit to the Oversize Load sign completed during the “Harmonization Phase 1” be addressed in the upcoming Transport Meetings.

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The issue is simple this - If a Pilot/Escort vehicle is required by a State Size and Weight Rule/Regulations to have a bumper mounted sign on the Pilot/Escort vehicle and this sign covers up the sensors of the Crash Avoidance System or backing sensors, then we believe that there could be far reaching issues that will present themselves very quickly. If the welfare and or safety of the public is put at risk by requiring these bumper mounted signs, the accountability will be very quick in coming.

This issue is not a matter of “IF” but “When and how soon” – and the answer is “Now”!

Because of this, we ask you to do everything within your power to avoid this potential catastrophic issue from happening. The ability to address this issue quickly must be addressed by each State. Also, this must be addressed on the enforcement and compliance side as well and we ask the States to address this issue quickly and directly.

This is not a difficult issue to address. It does not require a legislation change in any State that we have reviewed. States can generally address this issue within the Regulations and changing a regulations is not complex. Rule change is a little more difficult but most States have Emergency Rule Making authority that could be used to address this issue.

In my conversations with some of the transportation companies, they also have the concern with the “Oversize Load” signs for the commercial vehicles and would ask that this be addressed in a timely manner as well because the same issues apply.

We would like to thank you for your time today and look forward to working with you in the future.

Respectfully,

A handwritten signature in black ink, appearing to read 'Randy Sorenson', followed by a long horizontal line.

Randy Sorenson
President
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