



Owner-Operator Independent Drivers Association

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January 16, 2026

Nicole Michel

Acting Associate Administrator Office of Research and Registration

Federal Motor Carrier Safety Administration

U.S. Department of Transportation

1200 New Jersey Avenue, SE

Washington, D.C. 20590

Re: Docket # FMCSA-2025-0391, “Agency Information Collection Activities; Proposals, Submissions, and Approvals: Crash Risks by Commercial Motor Vehicle Driver Schedules”

Dear Acting Associate Administrator Michel:

The Owner-Operator Independent Drivers Association (OOIDA) is the nation’s largest trade association representing the views of small-business truckers and professional truck drivers. OOIDA’s mission is to promote and protect the interests of its members on any issues that might impact their economic well-being, working conditions, and the safe operation of commercial motor vehicles (CMVs) on our highways.

As proposed, we do not believe the Information Collection Request (ICR) will achieve FMCSA’s objectives of answering questions related to driver schedules and how these factors impact overall driver performance and fatigue. Hours-of-Service (HOS) logs do not reveal anything about fatigue, simply how many hours a driver was on-duty. Additionally, crash rates tend to increase during certain times of day which may have absolutely no connection with how long a trucker has been on-duty. In order for a more accurate analysis, the ICR should incorporate control groups for comparison which are notably absent from the proposal.

Further, the ICR is overly reliant on telematics systems for participating carriers. This creates an inherent bias that will result in a non-representative carrier study population. There’s no indication that this collection effort will target multiple carriers of different demographics and sizes. We also question if selecting just 60 carriers will produce enough diversity among participants to be truly representative of the trucking industry. We encourage FMCSA to conduct further outreach to small carriers and owner-operators who might not utilize the prescribed telematics systems.

Ultimately, the agency does not provide sufficient information to support the ICR as currently structured.

Thank you,

A handwritten signature in black ink, appearing to read "Todd Spencer". The signature is fluid and cursive, with a large, stylized "T" and "S".

Todd Spencer
President & CEO
Owner-Operator Independent Drivers Association, Inc.