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March 23, 2021

Chairman Kumar P. Barve
House of Delegates
Environment & Transportation Committee
House Office Building, Room 2516 Bladen St.
Annapolis, MD 21401

Dear Chairman Barve:

As the committee is considering SB 291, I wanted to offer my perspective as a scientist and CEO who is heavily involved in the development of truck platooning technology. My company, Locomotion, is developing what we term Human-Guided Autonomy (SM) systems for truck convoys that is being tested right here in the mid-Atlantic. Locomotion is taking this 'Human-Guided Autonomy' approach to deploying fully autonomous trucks because it is safer, more economically beneficial as it scales out, and it not only harnesses the capabilities and strengths of today's professional truck driver, but it is also preparing them for the future of trucking in an increasingly autonomous truck world.

First and foremost, I want to thank the Maryland Department of Transportation (MDOT) and the Maryland General Assembly for your leadership in recognizing the benefits that truck platooning can offer. I had the honor of participating on a panel discussion at an event that the MDOT hosted last fall on truck platooning. As noted by the MDOT¹, truck platooning will benefit Maryland in the following ways:

- Safer truck operations
- Reduced fuel costs and emission reduction associated with truck platooning
- More predictable truck operations
- Lower shipping rates due to lower costs of operations.

While Locomotion believes SB 291 is a good bill, there is one adjustment that is needed to accurately reflect the current capabilities of truck platooning technology. This adjustment is critical to ensuring truck platooning in Maryland is correctly deployed in order to unlock the full benefit of the technology.

The requirement to have a driver in each vehicle traveling in a truck platoon fails to recognize an important use case and benefit unique to truck platooning. Autonomous truck platooning activity involves two SAE level-4 autonomy-equipped trucks working together, where the leader driver is actively engaged in driving and the follower truck is functioning in full autonomy mode. While follower drivers will be present in the early days of testing - a

¹ Maryland General Assembly, Department of Legislative Services, Fiscal and Policy Notes, SB 291, 2021, https://mgaleg.maryland.gov/2021RS/fnotes/bil_0001/sb0291.pdf

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significant strength in a Human-Guided Convoy approach to full autonomy - eventually, it will be more beneficial to have no one in the follower vehicle, or at least have the option.

Presently, the person in the following truck is in an off duty hours-of-service status, fully disengaged from any supervisory functions with no driving tasks required at all. It is a strong argument to say that the option to not have a truck driver in the follower vehicle could actually relieve the strain on the nation's truck driver shortage as human-guided convoys enable one professional truck driver to do the work of two, delivering two times the freight, two times farther, exponentially safer. If the second-driver requirement stands as is in SB 291, it will have a stifling effect on the deployment of autonomous truck technology in Maryland.

Again, thank you for your leadership on recognizing the benefits of autonomous truck platooning and allowing me the opportunity to share our perspective. As Maryland continues to move forward with autonomous truck platooning, please consider me as an expert in the field.

Sincerely,

Çetin Meriçli

Çetin Meriçli, Ph.D.
Chief Executive Officer,
Locomation