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## Supply Chain Safety Ignored and Unaccounted for in DOT Report

Washington, DC – The Truck Safety Coalition (TSC) is profoundly concerned to find that safety is not a consideration in DOT’s [Supply Chain Report](#) released today.<sup>1</sup> TSC Board President Dawn King described it as “Unacceptable and deeply disturbing not only to truck crash victims but to all roadway users.”

In its opening sentence, the report correctly identifies “the safe and efficient movement of goods” as a fundamental need (p.x).<sup>2</sup> Curiously, the remainder of the report completely disregards safety outcomes in its assessment and contains no meaningful safety policy recommendations. The report even expressly acknowledges that federal policy can reduce safety risks by virtue of its rulemaking and regulatory authority (*chart, p. xv*) and still declines to offer a corresponding safety-oriented policy goal.<sup>3</sup>

Any working definition of supply chain “efficiency” absent safety considerations and outcomes is incomplete and irresponsible. DOT’s stated mission is “to ensure America has the **safest** (*emphasis added*), most efficient and modern transportation system in the world.” Making meaningful strides to reduce truck crash deaths and injuries will never happen if safety is an afterthought, or worse, incorrectly viewed as incompatible with supply chain efficiency.

Truck crashes impose a steep cost to society with an annual taxpayer cost exceeding \$143 billion. Nearly 5,000 people, including truck drivers, lose their lives annually in preventable truck crashes with an additional 159,000 sustaining

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<sup>1</sup> United States. US Department of Transportation. *Supply Chain Assessment of the Transportation Industrial Base: Freight and Logistics: Executive Summary*. US Department of Transportation, 2022

<sup>2</sup> *Ibid.*

<sup>3</sup> *Ibid.*

severe injuries. DOT's unwillingness to account for these tremendous costs represents a massive market distortion that prioritizes the fastest and lowest cost methods of transporting goods while disregarding the escalating consequences to public safety.

The Teen Trucking Pilot program is not a supply chain "success" as DOT's report claims. This is a prime example of what is possible when safety is not part of the equation. The overwhelming abundance of data is emphatic that teens and trucks are a lethal combination. For example, the Insurance Institute for Highway Safety (IIHS) cites the University of Michigan research demonstrating a stunning *500 percent increase in injury crashes per mile* traveled with truck drivers younger than 21 compared with drivers of all ages.<sup>4</sup> The only operating environment where this idea is "successful" is one that disregards safety.

DOT's inexplicable 40+ year unwillingness to raise the commercial motor vehicle minimum insurance requirement is yet another example of what happens when safety costs are externalized. The Federal Motor Carrier Safety Administration reported to Congress in 2014 that the entire point of having minimum insurance requirements is to "assure that public safety is not jeopardized" (p 3).<sup>5</sup> FMCSA's report ultimately concluded that the current motor carrier financial responsibility minimum of \$750,000 is "inadequate" (p. 14).<sup>6</sup> Despite having rulemaking authority to reduce this safety risk, no action has been taken.

The Truck Safety Coalition does applaud DOT Policy Goal No. 40 (p. xxix), urging Congress to "eliminate the Fair Labor Standards Act motor carrier exemption". This recommendation will better compensate truck drivers who are currently not required to be paid overtime by their employers. Any holistic solution to reduce truck crashes must include improving truck driver work conditions, salary, and benefits. More policy solutions such as this can and will be surfaced when safety is a discrete component of supply chain efficiency analyses.

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<sup>4</sup> Blower, D.; Lyles, R.W.; Campbell, K.L.; and Stamatiadis, P. 1990. The Michigan heavy truck study. Lansing, MI: Michigan Office of Highway Safety Planning.

<sup>5</sup> United States. Federal Motor Carrier Safety Administration. *Examining the Appropriateness of the Current Financial Responsibility and Security Requirements for Motor Carriers, Brokers, and Freight Forwarders—Report to Congress*. Federal Motor Carrier Safety Administration, 2014

<sup>6</sup> Ibid.

The Truck Safety Coalition requests DOT redefine its working definition of supply chain efficiency to include all associated safety costs, including the [government-accepted](#) statistical value of human life. In addition, TSC calls upon Secretary Buttigieg to publicly pledge to terminate the Safe Driver Apprenticeship program immediately upon the first loss of life or severe injury. Lastly, TSC requests Secretary Buttigieg stand in solidarity with truck crash victims and the safety of all roadway users by increasing the motor carrier minimum insurance requirement. Truck crash deaths have increased nearly 45% in the last 10 years and bold action is necessary to address this crisis.

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*The Truck Safety Coalition (TSC) is a partnership between Citizens for Reliable and Safe Highways (CRASH), also known as The CRASH Foundation, and Parents Against Tired Truckers (P.A.T.T.). The Truck Safety Coalition is dedicated to reducing the number of deaths and injuries caused by truck-related crashes, providing compassionate support to truck crash survivors and families of truck crash victims, and educating the public, policymakers, and the media about truck safety issues. Visit our website at <https://trucksafety.org>*