

November 14, 2024

Katerina Downard
Senior Policy Analyst - EBR
Ministry of Transportation
438 University Ave, 12th Floor
Toronto, ON M7A 1N3

Sent via email to Katerina.Downard@Ontario.ca and uploaded to the Environmental Registry of Ontario

Dear Katerina Downard,

Re: ERO-019-8940 / 24-MTO017 Proposed Automated Commercial Motor Vehicle Pilot Program framework

The Ontario Federation of Agriculture (OFA) is pleased to provide a rural perspective on the proposed Automated Commercial Motor Vehicle Pilot Program (ACMV) framework. According to the ER posting, the proposed pilot may provide long-term benefits to carriers, consumers, municipalities, and rural, remote and/or underserved communities by assessing opportunities for improving road safety and supporting an efficient movement of goods.

Rural Ontario communities face challenges attracting commercial vehicle operators. We support the aims of the AMCV pilot to safely test automated technologies and assess opportunities to improve road safety, while supporting the trucking sector.

OFA supports the Ministry in recognizing that through data assessment and insights gathered, the pilot will need adjustments. As the pilot matures and route selections broaden to include roads in various states of repair, we recommend that evaluation of successful ACMV integration also consider different road designs. For example, rural gravel roads, roads with soft shoulders, roads with narrow shoulders, and roads with steeply graded slopes, should be evaluated to ensure they do not compromise the safety of vehicle drivers sharing the road with ACMVs.

Sincerely,



Drew Spoelstra
President

cc: OFA Board of Directors