



American Academy of Sleep Medicine

February 19, 2014

Honorable David J. Friedman, Administrator
U.S. Department of Transportation
National Highway Traffic Safety Administration
Attn: NHTSA-2014-0014
1200 New Jersey Avenue SE, West Building
Room W12-140
Washington, DC 20590

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Jerome A. Barrett
Executive Director

Re: NHTSA-2014-0014 2014-2018 Strategic Plan

Dear Administrator Friedman:

The American Academy of Sleep Medicine (AASM) appreciates the opportunity to comment on the National Highway Traffic Safety Administration's (NHTSA) notice requesting recommendations for the 2014-2018 strategic plan, published in the February 4, 2014 *Federal Register*. As the premier leader in setting standards and promoting excellence in sleep medicine health care, the AASM is offering to assist the NHTSA in all recommendations mentioned in this letter. The AASM respectfully recommends the following: public education on the dangers of drowsy driving; law enforcement education on recognizing drowsy driving; and designated rest areas for drivers.

Public Education on Drowsy Driving

The AASM values NHTSA's research and educational resources on drowsing driving. However, most of the information available is outdated and difficult to locate on the website. The AASM recommends that education on drowsy driving be reintroduced as one of the top priorities for the agency's "driving safety" initiative.

Recently, an Oregon Court of Appeals exonerated a 17-year-old honor roll student, who killed a motorcyclist in a 2010 drowsy driving accident, agreeing with a defense expert that drivers can underestimate the consequences of drowsy driving. According to the AAA Foundation for Traffic Safety, an estimated 16.5 percent of all fatal motor vehicle crashes in the United States involved a drowsy driver. Similar cases are increasing in America and drivers are unaware of the impact of drowsy driving.

Educating the public on the dangers of and penalties for drowsy driving, similar to the agency's efforts for distracted driving, is crucial to making Americans aware of the problem and preventing needless injuries and deaths. Public education on drowsy driving can be added as one of the "Traffic Safety Marketing" campaigns. Education resources can include prevention toolkits for state and local officials, fact sheets on drowsy driving, and short videos. One such video that can be utilized in the campaign is the AASM's [SAFE-D video](#), which discusses signs, causes, and effects of drowsy driving.

Law Enforcement Education on Recognizing Drowsy Driving

As a national leader in planning and developing traffic safety resources for law enforcement, AASM recommends that NHTSA create marketing materials and tools that can be used to educate law enforcement on the hazards of drowsy driving and how to recognize the signs.

Last month, a severely fatigued truck driver struck and killed an Illinois tollway worker and severely injured a state trooper on Interstate-88 in Aurora, IL. Several states, including Illinois, have introduced or passed legislation requiring law enforcement and judicial courts to impose criminal penalties to address similar incidents. However, most legislation does not include preventative measures to help law enforcement identify drowsy drivers and reduce highway accidents.

Education is needed to help law enforcement recognize the signs of drowsy driving and how to respond to a fatigue driver. The NHTSA can educate law enforcement on these preventative measures through a factsheet and toolkit.

Designated Resting Areas for Fatigued Drivers

Finding an appropriate resting area is a challenge for many drivers. The AASM recommends that NHTSA promote resting areas for fatigued drivers, and encourage state officials to improve commercial truck stops.

The California Department of Transportation recently funded a study showing that the percentage of collisions caused by drowsy driving further than 30 miles from rest areas was significantly higher than for collisions 30 miles or less from rest areas.¹ Additionally, the Federal Highway Administration's *Commercial Driver Rest and Parking Requirements* report found that the majority of truck drivers and trucking executives feel that there are not enough parking options for restful sleep.² The report also revealed how most parking spaces were not suitable for truck drivers' vehicles.

Promoting resting areas for fatigued drivers could prevent injuries and deaths. Further, using existing spaces more effectively and efficiently can help truck drivers get restful sleep. The NHTSA can promote designated rest areas, such as tollway oases, highway rest stops, mass transit parks, or the parking lot of a government-owned building for fatigued drivers to use. Additionally, NHTSA should encourage state and local governments to make arrangements, when practicable, with private business owners near highways allowing truck drivers to rest in privately owned parking lots. These strategies can be developed under the drowsy driving campaign.

¹ U.S. Department of Transportation, Federal Highway Administration. Commercial driver rest & parking requirements: making space for safety [Internet]. Washington, DC: Federal Highway Administration; 1996 May [cited 2014 Feb 19]. Available from: <https://www.fhwa.dot.gov/publications/research/safety/commercial.pdf>.

² Banerjee I, Lee J, et al. Rest areas – reducing accidents involving driver fatigue [Internet]. Sacramento, CA: California Department of Transportation; 2010 Apr [cited 2014 Feb 19]. Available from: http://www.dot.ca.gov/newtech/researchreports/reports/2009/2009-05_design_and_construction.pdf.

Thank you again for allowing us the opportunity to comment on these important issues. These measures will help the agency with its mission to improve highway safety. Please contact AASM Executive Director Jerome Barrett at (630) 737-9700 for further information. We look forward to working with you on your strategic plan.

Sincerely,

M. Safwan Badr, MD
President

cc: Jerome A. Barrett, Executive Director