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November 18, 2021

Mr. Steven Cliff
NHTSA Deputy Administrator
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Deputy Administrator Cliff,

The National Waste & Recycling Association's (NWRA) members' frontline workers are some of the most vulnerable roadside workers in America today. In 2019, waste collection was the sixth deadliest profession according to the Bureau of Labor Statistics. By including the waste and recycling industry in NHTSA research on vulnerable road users, we could save lives by identifying solutions to problems such as distracted driving.

Developing safer connected vehicle systems that keep drivers' eyes on the road will help keep our industry's workers out of harm's way. Aside from the United States Postal Service, the waste and recycling industry is the only one to transit every road in America at least once each week. We share these roads with drivers who addictively read and compulsively respond to notifications.

The Infrastructure Investment and Jobs Act (Public Law No: 117-58) mandates new passenger vehicles have drunk driving/impaired driving prevention technology. We applaud Congress for making this directive but believe the same should be done for distracted driving prevention technology. Such technology is not theoretical. Apple applied for a patent in 2008 and was granted it in 2014 that limits iPhone usage in the driver's seat of a vehicle. In its application, Apple noted the danger these devices present relative to distracted driving. In Apple's new operating software iOS 15, the "Driving Focus" mode silences/limits text messages, calls and other notifications when you turn it on. Car manufacturers in America need to work with phone developers to make such technology the default setting for drivers in new cars.

We look forward to cooperating with you to protect the American people from the unreasonable harm caused by mobile phones' addictive nature. Implementing safe driving prevention technology in new cars is the indispensable solution that our industry, many like it and American drivers need to travel roads safely.

NWRA represents the private sector waste and recycling industry. It is estimated that the private sector waste and recycling industry accounts for more than one million jobs and generates nearly a quarter of a trillion dollars in U.S. GDP. Our members operate in all 50 states and the District of Columbia. Waste and recycling facilities number nearly 18,000 scattered throughout the U.S., mirroring population centers. Our nearly 700 members are a mix of publicly traded and privately owned local, regional and Fortune 500 national and international companies. The solid waste industry directly employs nearly 453,000 people as of September 2021.

Thank you for your time and dedication. We would welcome the opportunity for further correspondence and meet to discuss protecting our industry's frontline vulnerable road users and other drivers in the United States. My contact information is dsmith@wasterecycling.org.

Sincerely,

Darrell K. Smith, PhD
President and CEO
National Waste & Recycling Association

A handwritten signature in black ink on a light gray rectangular background. The signature reads "Darrell K. Smith" in a cursive, flowing script.