



September 23, 2022

Dockets Operations  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
West Building, Ground Floor W12-140  
Washington, DC 20590-0001

**RE: Unique Electronic Identification of Commercial Motor Vehicles [Docket No. FMCSA-2022-0062; RIN 2126-AC54]**

The American Association of Motor Vehicle Administrators (AAMVA) is pleased to support the proposal for Federal Motor Carrier Safety Regulations (FMCSRs) to require every commercial motor vehicle (CMV) operating in interstate commerce to be equipped with electronic identification capabilities.

Technology capable of wirelessly communicating a unique identification number when queried by Federal or State motor carrier safety enforcement personnel carries numerous benefits. It facilitates vehicle identification in areas not covered by a fixed scale facility; it assists officers in identifying vehicles for CVSA inspection based on out-of-service (OOS) criteria, safety scores and other information available through an automated query of state motor vehicle and FMCSA data; and it enhances law enforcement officer safety and efficiency by identifying which vehicles are most in need of inspection rather than relying on more randomized inspection methodologies.

AAMVA anticipates that the electronic communication protocol would be embedded in every commercial vehicle and be broadcast actively to allow for passive reading of the unique identifier. This would allow enforcement officers to gather the identifier in the same manner as a scale facility. This functionality would provide enforcement officers with the capability to conduct fewer, but more efficient, traffic safety stops on identified inspection-worthy vehicles.

AAMVA is glad to support the request for rulemaking from the Commercial Vehicle Safety Alliance (CVSA). We feel the development of a broadcast unique electronic identifier for commercial vehicles will result in increased roadway safety, greater safety efficiencies, and better protections for our law enforcement personnel.

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