

OHIO CONFERENCE OF TEAMSTERS



272 W. Market Street
Akron, Ohio 44303
Phone: (330) 252-1207
Toll Free: (844) 586-2575
Fax : (330) 252-5801

Patrick J. Darrow
President

David D. Dudas
Secretary-Treasurer

Randall Verst
Vice President

Travis Bornstein
Recording Secretary

Dennis Roberts
Trustee

Max Zemla
Trustee

Kenny Howard
Trustee

March 22, 2021

Chairwoman Kunze, Vice Chairman Reinke and Ranking Member Antonio, on behalf of the over 50,000 members of the Ohio Conference of Teamsters, we ask you to oppose a provision in substitute House Bill 74 that was recently added.

This bill would increase the weight limit of personal delivery devices (PDDs) from 200 pounds to 550 pounds, excluding cargo (a 175% increase). With no limit on the weight of cargo, these devices may end up weighing nearly a half ton, moving through Ohio neighborhoods at a currently allowed rate of speed of 10 mph.

It is our position that with such a large increase in weight, the entire state statute on PDDs must be revised, given the safety, liability, community concerns of larger devices.

With a proposed increase in weight, there must likewise be changes in slowing the devices down to avoid collisions with people and property. In other PDD bills currently before state legislatures, the speed limits of these devices are as low as 3.5 mph (Maryland SB 726) and 6 mph (Kansas SB 161); states that in both cases are proposing significantly lower weight limits than Ohio (200 lbs in MD and 150 lbs in Kansas).

Likewise, the liability dollar amount under current law is \$100,000 in general liability coverage. While this figure is already likely too low for the currently authorized bots, under the proposed increased weight limit, this is certainly too low and must be adjusted significantly. Again, we can look to another city, where in San Francisco, a public works order for automated delivery devices from 2018 includes \$1,000,000 in general liability coverage¹, in addition to automotive liability and workers compensation insurance.

TEAMSTERS - PEOPLE HELPING PEOPLE



A specific penalty provision must also be revisited if any change is to be made to the weight limit of such devices. Under current law, there is no mechanism from authorities to fine entities operating these devices if speed limits, weight limits, or other operational rules are disregarded. These devices are already providing wear and tear on sidewalks not designed for commercial vehicles without any licensing/tagging/fees, and if an increase in weight is to be considered, penalties and a licensing structure must be considered.

Finally, other issues that should be considered if any further changes are going to be made in making these devices larger and heavier include:

- State testing of individual devices at regular intervals, including testing under inclement weather conditions.
- Public disclosure of where companies are operating the devices and how many bots are deployed.
- Clarity on how many bots can be “monitored” by one individual.
- The ability for state and/or local elected officials to ban the devices within their jurisdiction.
- A notice to workers and mandated training if their jobs are likely to be impacted or automated due to deployment of the devices.
- Additional safety features to alert disabled pedestrians to the device’s presence (audible and visual warnings).
- A provision mandating that all incidents and accidents involving devices must be compiled and shared on a publicly available website.

Sincerely,



Patrick J. Darrow
President

PJD/lh