

Wednesday, February 12, 2025

The Honorable Dan Ruby  
Chairman – North Dakota House Transportation Committee  
State Capitol  
600 East Boulevard Ave.  
Bismarck, ND 58505



Re: Testimony in Opposition of HB1614

Chairman Ruby, members of the committee, thank you for the opportunity to testify. My name is Dr. Mike Metzger and I am the Vice President of Agriculture and Research for Minn-Dak Farmers Cooperative and stand before you in OPPOSITION to House Bill 1614.

Minn-Dak Farmers Cooperative is a grower-owned sugarbeet processing facility located at the southern end of the Red River Valley in Wahpeton, North Dakota. We have proudly been in business since 1974 and continue to be one of the industry's most advanced and proficient sugar production facilities today. As Vice President of Agriculture and Research, my primary area of responsibility is focused upon the research and production aspects of the agricultural arena. I am responsible for both the current production techniques and future technologies encompassing the growing, harvesting and delivering of sugarbeets for processing from 500 shareholders raising sugarbeets on 105,000+ acres.

Every year, Minn-Dak Farmers Cooperative utilizes a fleet of tractor/trailer units to transport over two million tons of sugarbeets from outside receiving stations into the factory for processing. During our processing campaign, our fleet of 14 trucks runs 24-hours per day / 7-days per week. Collectively, our Fleet puts on over 2.5 million miles during a single hauling campaign (August – April). To put this into perspective, this collective distance is enough to circumnavigate the earth over 1,000 times during a seven-month period. I am also happy to report that our Fleet has not had a moving violation of any sort within the past six seasons. This speaks volumes about the safety culture and professionalism of the drivers employed at Minn-Dak.

Commercial truck drivers are getting VERY hard to come by not only on a national level, but even more so locally. I truly believe that the new rules/regulations to acquire a Commercial Driver's License will only exacerbate this already troubling issue, especially in rural areas. In order to continue to operate, we as a business need to be able to more with less. Leader-Follower Platoon Technology has proven to be both effective and safe in other geographies and is the reason behind our cooperative selected this technology for our ongoing pilot project. The hope going forward is that we can easily adjust or increase our haul capacity by simply adding automated trucks to each of our human operated trucks.

In May of 2022 Minn-Dak announced its partnership with Kratos Defense & Security Solutions to deploy a set of trucks that could operate as a Leader/Follower Platoon. It is of note that Driverless

Truck Leader/Follower Platooning is different from Autonomous Trucks independently driving themselves. Leader-Follower Platooning includes one human-driven truck followed by one driverless truck. In this scenario, we maintain a human decision maker who is always within 300 feet or less of the driverless vehicle. This enables the human-driver to make all the “hard” decisions for the driverless vehicle as it travels along the route. For example, if there is a work zone on the route, a stalled car, an emergency vehicle, etc. we rely on the human in the leader vehicle to make decisions versus full reliance on Machine Learning and Artificial Intelligence. This is a huge safety and reliability advantage that Leader-Follower Platooning has versus an independently operating driverless truck.

When Minn-Dak started this Leader-Follower pilot project, safety was the primary concern. With this in mind, Kratos and Minn-Dak developed a deployment strategy to introduce this technology to North Dakota roadways in a “crawl-walk-run” as we vetted the technology within our operating environment in the safest possible way. For example, we have pre-run all our sugarbeet hauling routes in manual mode with the system in idle. This enabled us to evaluate all routes for any kind of anomalies as well as ‘environmentally stress-test’ the sensors and navigation equipment. From there, we systematically started implementing more and more of the automated system until we got to where we were operating the system in full driverless Leader-Follower Platooning mode with a CDL Safety Rider onboard the driverless follower who could take over manual control at any time. This is the current protocol that we are utilizing today and is basis of the Platooning Plan approved by both the North Dakota Department of Transportation and the North Dakota Highway Patrol. To continue to improve and enhance the system, we need to have it on the road running the routes and functioning as needed to support our sugarbeet rehaul operations. As the system is running, we are obtaining valuable data regarding the system, environment, operators, and the interactions with other vehicles on the road. This kind of data will enable us to continue to improve performance and ensure the highest levels of safety as we move forward through our crawl-walk-run process.

To date, we have successfully logged over 50,000 miles on North Dakota highways with our Leader-Follower Platoon with the Follower vehicle in ‘autonomous’ mode. The equivalent of driving from Fargo to Beach, ND, over 150 times on two lane roads, this has been done without a single moving violation, accident, or system failure. As mentioned earlier, we continue to operate the remote Follower vehicle with a CDL Safety Rider onboard and have no near-term plans to remove the Safety Rider while we progress through the ‘crawl-walk-run’ mentality of our ongoing pilot program. While the CDL Safety Rider fine for now, moving forward, in order to make economic sense, we will at some point need to remove the requirement for a Safety Rider altogether or, at the very minimum, eliminate the need for the Safety Rider to have a CDL endorsement. Just like what got us this point, I envision this future milestone as a close collaboration working with policy regulators and roadway authorities. Keeping everyone on the same page will help move projects like this forward through project visibility and collaboration. This is exactly what we have done since our initial deployment hauling sugarbeets from our receiving stations to the factory for processing. It’s like a three-legged stool that has one leg as government entities, one as academia, and the other as agricultural industry to ensure a solid base for implementation and proliferation of beneficial technology.

House Bill 1614 would prohibit us from even getting to this point or having these future conversations. It would essentially stop the development and implementation process as it stands today and keeping it static going forward. The regulatory environment focused on this type of technology in the U.S. is very good overall and continuing to improve. Over 32 states currently have some form of driverless/autonomous vehicle legislation in place with 13 states having legislation in place specifically aligned to Leader-Follower Platooning, North Dakota included. At Minn-Dak, we have been safely operating under the current legislation and this type of Leader-Follower technology is what will enable us to efficiently operate in the future as the CDL driver shortage continues to plague rural areas of the state.

The current legislation surrounding the use of Leader-Follower Platoon technology ensures that North Dakota companies can remain competitive, are able to maintain their supply chains, and enables the state to continue to develop a future framework for automated driving technology focused on safety, accessibility, and economic growth. Again, House Bill 1614 puts an end to this progress.

Chairman Ruby, members of the committee....On behalf of Minn-Dak Farmers Cooperative and our 500 growers/owners, we encourage a DO NOT PASS recommendation on House Bill 1614.

A handwritten signature in blue ink, appearing to read 'M. Metzger', is positioned above the typed name.

Mike S. Metzger, Ph.D.  
VP – Agriculture & Research  
Minn-Dak Farmers Cooperative