



Stop the Assault on Truck Safety

Truck crash victims and survivors, Advocates for Highway and Auto Safety, AAA, International Brotherhood of Teamsters, American Public Health Association, SMART, American Short Line and Regional Railroad Association, Consumer Federation of America, Railway Supply Institute, Truck Safety Coalition, Road Safe America, Parents Against Tired Truckers, Citizens for Reliable and Safe Highways, The John Lindsay Foundation, KidsAndCars.org, and Trauma Foundation are Opposed to Anti-Truck Safety Provisions

Here are some numbers to consider:

Safety:

- **4,000** people killed, **100,000** more injured in truck crashes every year on average.
- Commercial motor vehicle crashes cost our nation **\$99 billion** annually.
- **96%** of the fatalities are occupants of the passenger vehicle in fatal two-vehicle crashes between a large truck and a passenger motor vehicle.
- **17%** increase in fatalities and **28%** increase in the number of people injured in large truck crashes over the last four years.
- **76%** - the number of respondents in a recent public opinion survey opposed to longer and heavier trucks.
- **80%** - the number of respondents in a recent public opinion poll opposed to increasing truck driver working and driving hours.

Trucking Industry:

- At least **84 feet** – the length of a double tractor trailer if the FedEx special interest provision to increase trailer length from 28 to 33 feet passes.
- At least **97,000 pounds** – the weight of trucks if the national limit is lifted or states continue to receive special interest exemptions. In the current version of the THUD bill, Idaho can allow trucks up to **129,000 pounds** and Kansas would potentially be operating tractor trailers up to **100 feet** or more in length.
- **82 hours** – the work week for truck drivers if the restart rules for hours of service are permanently rolled back.
- **2 nights** of sleep each week taken away from truck drivers after long working and driving hours.

Don't let the trucking industry stack the numbers against public safety

- ✓ **NO to FedEx Double 33' tractor trailers on federal and local roads (House THUD bill Sec. 125).** The anti- safety, pro-industry plan will overturn state laws and bulldoze states to accept trucks that are at least 84 feet long on federal, state and local roads.
 - If truck lengths are increased from 28 to 33 feet, the laws of 39 states (AL, AK, AR, CA, CO, CT, DE, GA, HI, IL, KS, KY, LA, ME, MD, MI, MN, MS, MO, NE, NH, NJ, NM, NY, NC, ND, OH, OK, PA, RI, SC, SD, TN, TX, VT, VA, WA, WV, WI) which currently prohibit longer trailers may be overturned. States where double 33s are prohibited and states where they are not running will be pressured to allow these longer trucks on their roads which are not equipped to accommodate them.
 - Longer double-trailer trucks will make passing even more dangerous than it already is. A double-trailer truck using 33-foot trailers would be at least 84 feet long, the height of an 8-story office building, and a triple-trailer truck would be at least 120 feet long, equivalent to a 12-story building. These longer trucks would dwarf the size of an average car and are the equivalent of 5 to 8 passenger cars in length.
 - Increasing lengths will set back intermodal efficiency. At present, intermodal rail cars are equipped to carry six, 28-foot trailers end to end. If trailers are lengthened to 33 feet, rail cars would only be able to carry two trailers per trip. This is half the number of trailers and a 41% reduction in intermodal efficiency.

- ✓ **NO nationwide truck size and weight increases raising the federal 80,000 lbs. limit to 97,000 lbs. and more, or granting weight or length exemptions for specific states such as Idaho and Kansas (House THUD bill Secs. 124 and 126) or specific industries. The provision would allow Idaho to operate trucks up to 129,000 pounds and Kansas to operate trucks potentially more than 100 feet long.**
 - By overwhelming margins in numerous public opinion polls over the last 20 years, the American public consistently and convincingly rejects sharing the road with bigger, heavier and longer trucks. The most recent poll in January 2015 by Harper Polling revealed that 76% of respondents oppose longer and heavier trucks on the highways and 79% are very or somewhat convinced that heavier and longer trucks will lead to more braking problems and longer stopping distances, causing an increase in the number of crashes involving trucks.
 - Special interest truck size and weight exemptions are essentially “earmarks” for states and “unfunded mandates” imposed on all American taxpayers who bear the cost of federally-financed infrastructure damage and repairs.
 - When special interest or state exemptions are passed, there is pressure on neighboring states to push for similar exemptions. Each special exemption is eating away at the comprehensive federal limit and endangering motorists.

- ✓ **NO to extending “Collins Amendment” tucked into the 2015 overall federal spending bill last December that dramatically increases the working and driving hours of truck drivers up to 82 hours a week and takes away their “weekend” off, resulting in more tired truckers and jeopardizing safety (House THUD bill Sec. 132).**
 - A provision added to the Cromnibus bill (Pub. L. 113-235) in December 2014 rolled back important safety reforms to hours of service (HOS) rules which were implemented by the DOT in July 2013 after a lengthy rulemaking process which considered 21,000 formal public comments, thorough and compelling scientific research, extensive stakeholder input, as well as three lawsuits.
 - This major change will significantly increase working and driving hours for truck drivers, from 70 hours to 82 hours. Essentially, this provision takes away the two-night off “weekend” for truck drivers.
 - With this provision, the HOS rule reverts to the Bush Administration rule in effect when a 2006 survey of truck drivers found an alarming 65% of truck drivers reported they had often or sometimes felt drowsy while driving and nearly half admitted to falling asleep while driving in the previous year.
 - The assertion that the 34-hour rest period put trucks on the road at times when children are going to school is false. The 34-hour rest period did not restrict a driver from driving at night. In fact, the rule placed no restrictions whatsoever on when a truck driver must drive.

- ✓ **NO to a prohibition on a rulemaking going on right now at the U.S. Department of Transportation to determine whether or not motor carriers, including trucks and buses, are required to have sufficient insurance coverage which has not been reviewed and revised since 1985 (House THUD bill Sec. 134).**

- ✓ **YES to putting the safety of American families and truck drivers first and not the economic agenda of the special trucking interests.**

The New York Times

A Foolish Attempt to Weaken Truck Safety

By THE EDITORIAL BOARD MAY 26, 2015



Credit Eric Gay/Associated Press

The trucking industry is again pushing Congress to allow bigger and heavier trucks with overworked drivers behind the wheel onto the country's roads.

Republican lawmakers have attached a long industry wish list to an appropriations bill that will be voted on by the House in the coming weeks. It includes provisions that would allow trucks to carry longer trailers across the country, make it harder for the Department of Transportation to require drivers get more rest before they hit the road and forbid the department from raising the minimum insurance it requires trucks and buses to carry. The insurance levels have been in effect since 1985.

Trucking companies seem to have been emboldened by their success last year in getting Congress to temporarily suspend parts of a Transportation Department regulation meant to give truck drivers at least 34 hours of rest. That rule was meant to ensure that truck drivers got at least two consecutive nights of rest after working 60 hours in seven consecutive days or 70 hours in eight days. The industry had complained — wrongly in our view — that the rule, which went into effect in July 2013, “exacerbates congestion” and could make highways less safe by forcing more truck drivers onto the roads during morning rush hours.

The language in the House appropriations bill will forbid the Obama administration from fully reinstating that rule unless a study shows that the rule resulted in a “statistically significant” improvement in safety, work schedules and driver fatigue, health and longevity. That is an impossibly high bar to meet and, if enacted, the measure will surely result in more tired and sleepy drivers on the road.

Another provision would allow trucks to pull two 33-foot-long trailers, up from the current federal minimum of two 28-foot-long trailers. (States can chose to allow longer trailers but most do not.) Truckers say this will improve safety, because it will result in fewer trucks on the road. But that is not believable because part of the industry's motivation is to take business away from railroads. If they are successful in that effort, the number of trucks on American highways could just as easily go up. In fact, there is good reason to worry that longer trucks will be less safe simply because trucks with multiple trailers are more unstable and take longer to stop than other vehicles.

Public interest groups such as Advocates for Highway and Auto Safety; the Teamsters, which represents truck drivers; and the Obama administration have objected to the trucking provisions in the House bill. And with good reason. In 2013, the latest year for which data is available, 3,964 people died in accidents involving large trucks, most of whom were riding in another vehicle or were pedestrians. That is up 17 percent from 2009. Over the same period, traffic fatalities overall have fallen 3 percent, to 32,719.

It is hard to know for sure why the number of fatal accidents increased. It could be that there were more trucks on the road in 2013 than during the recession. But this data should give lawmakers serious pause before they make major changes to trucking regulations in an appropriations bill.

A version of this editorial appears in print on May 26, 2015, on page A18 of the New York edition with the headline: A Foolish Attempt to Weaken Truck Safety.



ADVOCATES
FOR HIGHWAY
& AUTO SAFETY



Pedestrian



Bicycle



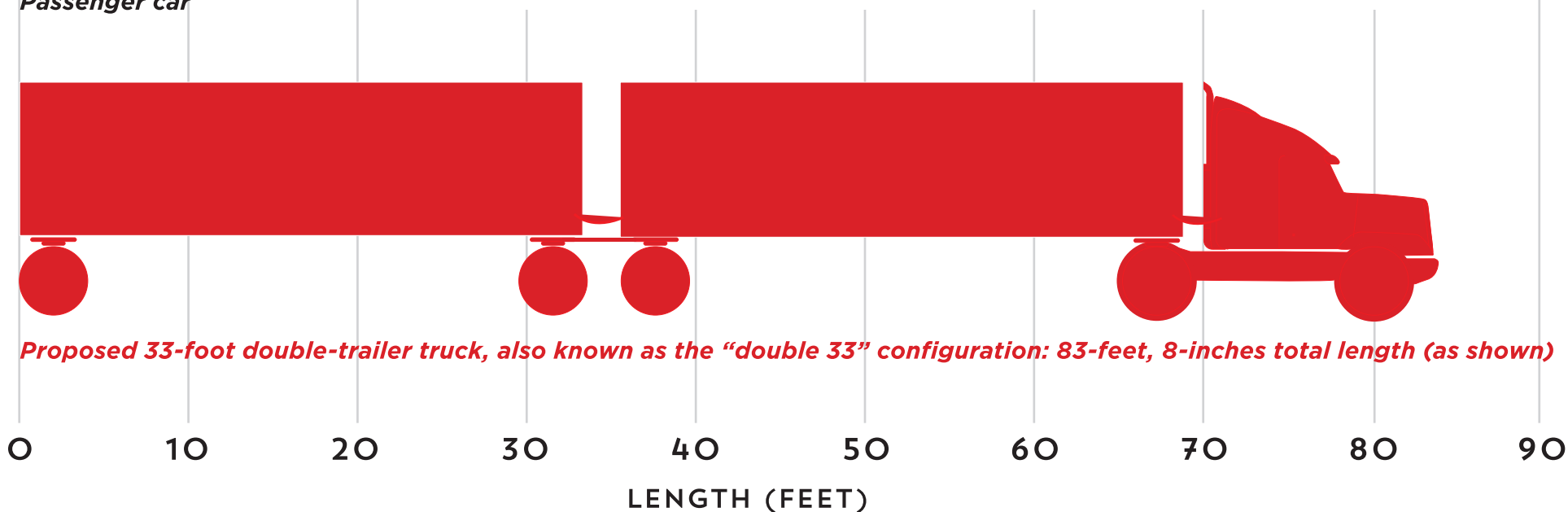
Motorcycle



Passenger car

WOULD YOU FEEL SAFE DRIVING NEXT TO A DOUBLE 33?

(DOUBLE 33s ARE LONGER THAN AN 8-STORY BUILDING IS TALL)



ROGER F. WICKER

MISSISSIPPI

ARMED SERVICES

BUDGET

COMMERCE, SCIENCE AND TRANSPORTATION
ENVIRONMENT AND PUBLIC WORKS

United States Senate

WASHINGTON, DC 20510

SUITE 555

DIRKSEN SENATE OFFICE BUILDING

WASHINGTON, DC 20510

(202) 224-6253

www.wicker.senate.gov

June 18, 2015

The Honorable Susan Collins
Chairman
Senate Committee on Appropriations
Subcommittee on Transportation,
Housing, Urban Development, and Related
Agencies
SD-186
Washington, DC 20510

The Honorable Jack Reed
Ranking Member
Senate Committee on Appropriations
Subcommittee on Transportation,
Housing, Urban Development, and Related
Agencies
SD-186
Washington, DC 20510

Dear Chairman Collins and Ranking Member Reed:


We are writing to urge you and your colleagues on the Senate Appropriations Committee to oppose possible language that may come up during the Senate's consideration of the FY 2016 Transportation, Housing and Urban Development (THUD) bill. This language would force states to accept double 33-foot-long trailers on all U.S. highways. We believe that provisions of this nature should first be fully considered in the House and Senate by committees with jurisdiction over this important policy area.

The U.S Department of Transportation (USDOT) just this month publicly released its Technical Reports in response to a study mandated in the Moving Ahead for Progress in the 21st Century Act (MAP-21). USDOT found significant data limitations in its analyses, concluding that "no changes" in the relevant laws and regulations should be considered until these data limitations are overcome.

Moreover, we believe the proposed measure on double 33-foot-long trailers could have a negative impact on highway safety, accelerate wear and tear on the nation's highway system, ignore the laws of many states that prohibit these large trailers, and significantly disrupt the freight industry – possibly even putting some trucking companies out of business. At a minimum, there has not been sufficient dialogue around this measure to understand its full impact.

Please oppose any legislation with provisions related to nationwide changes in truck size under the jurisdiction of the Senate Commerce Committee and truck weights under the jurisdiction of the Senate Environment and Public Works Committee.

We appreciate your work on the transportation appropriations bill and your efforts to ensure we have a safe transportation network.


ROGER F. WICKER
United States Senator

Sincerely,


RICHARD BLUMENTHAL
United States Senator

June 18, 2015

The Honorable Susan Collins
United States Senate
413 Dirksen Office Building
Washington, D.C. 20510

TheHonorable Jack Reed
United States Senate
728 Hart Senate Office Building
Washington, D.C. 20510

Dear Senators Collins and Reed,

The undersigned transportation companies serve the nation's economy by employing tens of thousands of people throughout the United States, who deliver everything from raw materials, to food, to medicine – every day.

We are writing to urge you and your colleagues on the Senate Appropriations Committee to **oppose** an amendment in the transportation budget. This amendment would force states to accept double 33' trailers on all U.S. highways. The trucking industry is deeply divided on this issue.

This measure would have a negative impact on highway safety, accelerate wear and tear on the nation's highway system, and make it very difficult for small trucking companies, which are the heart of our industry, to compete. There has not been sufficient dialogue around this measure to truly understand the unintended consequences it would have.

Further, the U.S. Department of Transportation has just released a long-awaited comprehensive study on truck size and weight limits. The report concluded that no changes in the relevant truck size and weight laws should be considered at this time.

We would be happy to personally visit with you and your colleagues further, on the reasons why this amendment should not be adopted. Thank you for your public service to the United States.

The Undersigned:

Paul Will
CEO
Celadon Trucking
Indianapolis, Indiana

Don Orr
President
Central Transport
Waco, Texas

David Parker
President and CEO
Covenant Transport
Chattanooga, TN

Tonn Ostergard
President and CEO
Crete Carrier Corp
Lincoln, Nebraska

Don Bowman
Chairman
D.M. Bowman
Hagerstown, Maryland

Reggie Dupre
CEO
Dupre Logistics
Lafayette, Louisiana

Steve Gordon
President
Gordon Trucking
Pacific, Washington

Mike Gerdin
Chairman and CEO
Heartland Express
North Liberty, Iowa

John N. Roberts
President and CEO
JB Hunt Transport
Lowell, Arkansas

Jim Richards
President and CEO
KLLM Transport
Jackson, Mississippi

Kevin Knight
Chairman
Knight Transportation
Phoenix, Arizona

Charles Hammel
President
PITT OHIO
Pittsburgh, PA

Dan Cushman
President and CEO
PAM Transport
Tontitown, AR

Dave Daniels
President and CEO
May Trucking Co
Salem, Oregon

Jerry Moyes
Founder and CEO
Swift Transportation
Phoenix, Arizona

Robert A. Peiser
Chairman
USA Truck
Van Buren, Arkansas

cc: Members of the Senate Committee on Appropriations

20 Years of Public Opinion Polls and the Response is Always the Same – Consistent, Convincing and Compelling Opposition to Increasing Truck Size and Weight Limits

2015

- 76% of respondents oppose longer and heavier trucks on the highway.
Source: Harper Polling for the Coalition Against Bigger Trucks, January 2015
- 79% of respondents are very or somewhat convinced that heavier and longer trucks will lead to more braking problems and longer stopping distances, causing an increase in the number of crashes involving trucks.
Source: Harper Polling for the Coalition Against Bigger Trucks, January 2015

2014

- 73% of Illinois residents and 77% of Missouri residents oppose increasing the national cap on truck weight from 80,000 to 97,000 pounds.
Source: SMART Heavy Truck Survey Series, March 2014
- 80% of residents of the West Virginia 3rd District and 69% of Wisconsin residents oppose increasing the national cap on truck weight from 80,000 to 97,000 pounds
Source: SMART Heavy Truck Survey Series, May 2014

2013

- 68% of Americans are opposed to heavier trucks.
- 88% of Americans oppose increased taxes to pay for damage caused by heavier trucks.
Source: Lake Research Partners Poll, May 2013
- 75% of Kentucky residents oppose increasing the national cap on truck weight from 80,000 to 97,000 pounds.
- 78% of the residents of the Illinois 3rd District and 74% of the Pennsylvania 9th District oppose increasing the national cap on truck weight from 80,000 to 97,000 pounds.
- 72% of the residents of Kansas 1st and 2nd District, the Iowa 3rd District, and the Colorado 4th District oppose increasing the national cap on truck weight from 80,000 to 97,000 pounds.
Source: Poll taken 2013, SMART Heavy Truck Survey Series, May 2014
- 74% of the residents of the Indiana 4th District and the Missouri 8th District oppose increasing the national cap on truck weight from 80,000 to 97,000 pounds.
Source: Poll taken 2013, SMART Heavy Truck Survey Series, March 2014

2011

- 74% of Americans oppose the trucking industry's efforts to have Congress change the current law and allow heavier trucks on the roads.
Source: Lake Research Partners Poll, April 2011
- Nearly three quarters of registered voters oppose increasing the national cap on truck size from 80,000 to 97,000 pounds.
Source: Hart Research Associates, April 2011

2008

- 66% of Americans oppose changing the current law and allowing trucks carrying heavier loads on U.S. highways. *“Support for the measure is anemic (only 16% favor the efforts.) Opposition is deep and transcends gender, age, political identification, and region.”*
- Eight out of ten (82%) Americans feel trucks pulling double or triple trailers are more dangerous than those pulling just a single trailer.
Source: Lake Research Partners Poll, May 2008

2004

- By 77% to 16%, the public opposes increasing truck weight limits.
- 80% of Americans believe that trucks with two or more trailers are less safe than trucks with a single trailer.
Source: Lou Harris Poll, June 2004

1998

- By 71% to 21%, a majority of the American people are willing to pay higher prices for goods in exchange for tougher truck safety standards.
Source: Lou Harris Poll, April 1998

1996

- 88% of Americans oppose allowing bigger and heavier trucks on the highways.
- 80% are fully convinced that “trucks pulling two or more trailers are less safe than trucks pulling only one trailer.”
Source: Lou Harris Poll, May 1996



DOUBLE 33s: SAFETY FACTS

Looming Troubles With Longer Doubles

Two Too-Long Trailers: “Double 33s” are a truck tractor pulling two 33-foot trailers, for a total truck-trailer-trailer combination length of at least 84 feet – the height of an 8-story building.

Americans Reject Bigger Trucks: In poll after poll Americans have made it known that they oppose bigger trucks in any way, shape or form.

“Junk Science” Behind Double 33s: The New York Timesⁱ recently published an article exposing that the main study to support double 33 foot long trailers was funded by trucking industry interests – who stand to hugely profit if this change is allowed. According to The New York Times article, a fact sheet about the study did not reveal that FedEx commissioned the report until after the reporter investigated and inquired about the industry’s role. This study is based on a flawed analysis and was conducted by a researcher who has long promoted bigger trucks.

State Laws Ignored: A federal mandate for double 33 foot trailer trucks will preempt state laws in states that do not want double 33s, overriding state legislative decisions to protect public safety. Right now, there is a federal minimum of 28 foot trailers – states can already allow double 33s but are choosing not to. A federal law for double 33s would be a game changer which would put unsurmountable pressure on states to allow these overly long trucks on their roads at the expense of safety and state infrastructure spending. Currently, as many as 39 states (AL, AK, AR, CA, CO, CT, DE, GA, HI, IL, KS, KY, LA, ME, MD, MI, MN, MS, MO, NE, NH, NJ, NM, NY, NC, ND, OH, OK, PA, RI, SC, SD, TN, TX, VT, VA, WA, WV, WI) may not allow the operation of these double 33-foot trucks.

Truck crashes impose a heavy safety toll: On average, 4,000 people are killed and 100,000 more are injured in truck crashes annually.ⁱⁱ In a crash with a passenger vehicle and a truck, 96 percent of the fatalities are in the car.ⁱⁱⁱ Truck crashes impose enormous economic costs on society; the annual cost to society from crashes involving commercial motor vehicles is estimated to be over \$99 billion.^{iv}

Dangers Posed by Longer Doubles

- **Double-trailer trucks have a higher fatal crash rate than single-trailer trucks^v—**
 - Double trailer trucks have a 11 percent higher fatal crash rate than single trailer trucks.
 - A shift in freight transportation from single to double trailer configurations will lead to a higher safety risk to the public.
- **Longer trucks take more time to pass—**
 - Passing these behemoths will take longer and be more dangerous.
 - Longer double 33-foot trailers add a minimum of 10 feet to the length of current 28-foot double trailers, and are at least 84 feet long. Double 33s are equivalent in length to 5 average (16 foot) passenger cars. Passing, especially on two-way, two lane roads will be more perilous for passenger vehicles.
 - If used as a triple trailer truck, 33-foot trailers add at least 15 feet in length to the already immense size.
- **Longer trailers result in more off-tracking (incursions into other lanes of traffic)—**
 - Longer trailers will cross into adjacent lanes and interfere with oncoming traffic as well as traffic headed in the same direction of travel.
 - Longer trailers swing into opposing lanes on curves and when making right-angle turns.^{vi}
- **Longer trucks cause serious safety problems on state and local roads—**
 - Longer double trailer trucks will pose an even greater danger of increasing severe crashes as they enter and exit highways and also travel on local roads including lower-class two-way roads, with narrow lanes, winding alignments, limited sight distances, inadequate or no shoulders, and trees and telephone poles at the edgeline.

Burdens Imposed by Longer Doubles

- **Longer doubles are premised on “Junk Science” and flawed analysis—**
 - The study,^{vii} on which many of the safety and efficiency claims for double 33s are based, was produced under contract to Federal Express (FedEx) and ConWay. It contains 3 serious flaws:
 - ❖ It makes the spurious assumption that two trailers of different lengths (28 v 33 feet) would both be filled to equal weights despite carrying different volumes of freight;
 - ❖ It ignores the fact that 33 foot trailers would weigh more when empty than 28 foot trailers, which would decrease the calculated efficiency estimates on those portions of trips when operating below capacity or empty; and,
 - ❖ It miscalculates the comparative increase in payload (volume) of 33 foot trailers as compared to 28 foot trailers.
- **Longer trucks will result in less efficient intermodal freight transportation—**
 - Intermodal rail cars are equipped to carry six, 28-foot trailers end to end, stacked 2 high. Rail cars would only be able to carry three 33-foot trailers per trip, which equates to only half the number of trailers and a 41 percent reduction in intermodal efficiency.^{viii}
 - Existing rail cars cannot be modified to handle 33-foot trailers. Building new rail cars would be cost prohibitive as there are thousands of rail cars already in the field.^{ix}
- **Congress directed the U.S. Department of Transportation (DOT) to study bigger trucks and their impacts on safety and infrastructure—**
 - MAP-21, which passed with strong bi-partisan support, directed U.S. DOT to conduct a comprehensive two-year truck size and weight study to provide data on crash frequency and the impact of large trucks on safety and infrastructure.^x No truck size increase should be adopted while the Congressionally-mandated study is underway.
- **Public opinion polls are clear, consistent – Americans strongly oppose bigger trucks—**
 - The American public overwhelmingly opposes the relentless push by some corporate trucking interests to increase truck size and weight.^{xi}
 - Additionally, many groups and organizations are opposed to longer trucks, including: truck crash victims and survivors; Advocates for Highway and Auto Safety; Truck Safety Coalition; Parents Against Tired Truckers; Citizens for Reliable and Safe Highways; Coalition Against Bigger Trucks; Consumer Federation of America; The John Lindsay Foundation; Trauma Foundation; Center for Auto Safety; KidsAndCars.org; International Brotherhood of Teamsters; SMART Transportation Division (formerly UTU); American Short Line Railroad Association; and, Railway Supply Institute.

ⁱ Lipton, Eric (April 1, 2015), Trucking and Rail Industries Turn State Troopers Into Unwitting Lobbyists, The New York Times.

ⁱⁱ Traffic Safety Facts 2012: A Compilation of Motor Vehicle Crash Data from the Fatality Analysis Reporting System and the General Estimates System, NHTSA, DOT HS 812,032 (2012 Annual Report); and Quick Facts 2013.

ⁱⁱⁱ 2012 Annual Report.

^{iv} 2014 Pocket Guide to Large Truck and Bus Statistics, FMCSA, May 2014.

^v An Analysis of Truck Size and Weight: Phase I – Safety, Multimodal Transportation & Infrastructure Consortium, November 2013; Memorandum from J. Matthews, Rahall Appalachian Transportation Institute, Sep. 29, 2014.

^{vi} The U.S. Department of Transportation’s Comprehensive Truck Size and Weight Study: Volume III Scenario Analysis, Chapter VII: Roadway Geometry, FHWA-PL-00-029 (Volume III), August 2000.

^{vii} Woodrooffe, J., De Pont, J., (2011, April 11) *Comparative Performance Evaluation of Proposed 33 ft Double Trailers Combinations with Existing 28 ft Double Trailers*.

^{viii} Coalition Against Bigger Trucks (2014).

^{ix} *Id.*

^x Moving Ahead for Progress in the 21st Century Act, Pub.L. 112-141, Sec. 32801.

^{xi} Harper Polling Nationwide Survey, Commissioned by CABT, January 2015.



State of Mississippi

TRANSPORTATION COMMISSION

MIKE TAGERT

DICK HALL, CHAIRMAN

TOM KING

**RESOLUTION OF THE MISSISSIPPI TRANSPORTATION COMMISSION
DECLARING THEIR OPPOSITION OF THE POLICY RIDER TO THE
TRANSPORTATION, HOUSING AND URBAN DEVELOPMENT FISCAL YEAR
2016 APPROPRIATIONS BILL REGARDING THE PROVISION TO ALLOW
TRUCK DRIVERS TO WORK LONGER HOURS, HAUL LARGER DOUBLE
TRAILERS (TWIN 33s) IN EVERY STATE AND PREVENT THE U.S.
DEPARTMENT OF TRANSPORTATION FROM RAISING MINIMUM
INSURANCE REQUIREMENTS FROM THE CURRENT STANDARDS**

WHEREAS, Twin 33s are a truck tractor pulling two 33-foot trailers, for a total truck-trailer combination length of at least 84 feet;

WHEREAS, a federal mandate for Twin 33 foot trailer trucks will preempt state laws in states that do not want them, overriding state legislative decisions to protect public safety;

WHEREAS, on average 4,000 people are killed and 100,000 more are injured in truck crashes annually;

WHEREAS, double trailer trucks have an 11 percent higher fatal crash rate than single trailer trucks;

WHEREAS, longer trailer trucks result in more off-tracking into other lanes of traffic;

WHEREAS, longer trailer trucks pose a greater risk of severe crashes as they enter and exit highways and local roads;

WHEREAS, longer trailer trucks will result in less efficient intermodal freight transportation;

WHEREAS, extending the truck driver work week to a maximum of 82 hours is dangerous to both the drivers and the traveling public;

WHEREAS, the minimum insurance requirement standards haven't been changed since 1985 and this mandate would prevent them from being increased;

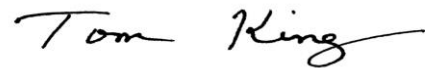
BE IT RESOLVED by the Mississippi Transportation Commission that they hereby declare their opposition to the policy rider to the Transportation, Housing and Urban Development Fiscal Year 2016 Appropriations Bill regarding the provision to allow truck drivers to work longer hours, haul larger double trailers (Twin33s) in every state and prevent the U.S. Department of Transportation from raising minimum insurance requirements from the current standards;

BE IT FURTHER RESOLVED that the Mississippi Transportation Commission's priority is the safety of the Mississippi traveling public.

ORDERED this the 23rd day of June, 2015.









State of Mississippi
TRANSPORTATION COMMISSION

MIKE TAGERT
NORTHERN DISTRICT

DICK HALL
CENTRAL DISTRICT
CHAIRMAN

TOM KING
SOUTHERN DISTRICT

April 30, 2015

The Honorable Thad Cochran
United States Senate
113 Dirksen Senate Office Building
Washington, D.C. 20510-2402

Dear Senator Cochran:

On behalf of the Mississippi Transportation Commission, we are writing in opposition to provisions we understand may be included in the FY 2016 Transportation, Housing and Urban Development (THUD) bill in the Senate Committee on Appropriations that would require the State of Mississippi to allow longer double-trailer trucks on its roads. As Chairman of the Senate Committee on Appropriations, we hope you will oppose any such provisions because these longer double-trailer trucks, often referred to as "Twin 33s," would endanger motorists, worsen our crumbling roads and increase the fiscal burden shouldered by Mississippi taxpayers.

This law if passed would require the State of Mississippi to allow longer double-trailer trucks—measuring 88 to 91 feet in length—onto all miles of Interstate and National Network routes statewide. In other words, the State of Mississippi would have no say in the matter. If longer-truck proponents desire the authority to operate longer double-trailer trucks and can demonstrate why Mississippians should permit them, they should present their agenda to the Mississippi Transportation Commission and State Legislature to make their case—not to the Federal government.

We have attached a map of these National Network routes for your review so you can see how widespread these bigger-truck operations would be. It is troubling to envision an 88-foot long double-trailer truck hauling from Walnut to Beaumont down State Highway 15, much less the extensive cluster of National Network routes that crisscross the State. These roads have difficulty handling the shorter double-trailer trucks today, and will surely bear extensive damage from even longer trucks. Complicating this problem is the last thing our roads need, and Mississippi taxpayers are unlikely to support an unfunded mandate from the Federal government.

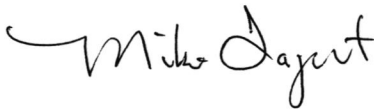
We also know that there are efforts in Washington to allow heavier single-trailer trucks, as well as triple-trailer trucks. The State of Mississippi is unwavering in its years-long position: We oppose changes in the Federal law that would allow increases in truck size or weight. We face an infrastructure crisis as it stands now, with 3,565 structurally deficient or functionally obsolete bridges in Mississippi—over 20 percent of all bridges statewide.

We urge you to oppose any efforts to insert the so-called “Twin 33s” provision in the THUD bill, and please oppose other efforts to increase the size or weight of trucks on Mississippi highways.

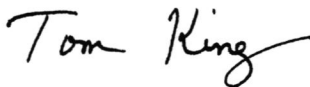
Sincerely,



Dick Hall
Chairman
Mississippi Transportation Commission



Mike Tagert
Commissioner, Northern District
Mississippi Transportation Commission



Tom King
Commissioner, Southern District
Mississippi Transportation Commission

cc: Cindy Mills, CABT Regional Director

Enclosure: Mississippi National Network map



09900SR0233 Enrolled

LRB099 11495 GRL 32630 r

1 SENATE RESOLUTION NO. 233

2 WHEREAS, The State of Illinois is committed to protecting
3 the safety of motorists on its roads and highways and to
4 protecting taxpayers' investment in our highway
5 infrastructure; and

6 WHEREAS, All vehicle crashes are a serious, deadly, and
7 costly problem to Illinois families, our State's health care
8 system, and the economy; and

9 WHEREAS, The Illinois trucking industry employs 278,920
10 men and women in Illinois; it is responsible for delivering
11 food to our grocery stores, supplying medicine and medical
12 supplies to serve our healthcare system, and transporting 78%
13 of the total manufactured freight in Illinois; and

14 WHEREAS, In 2013, there were 10,397 crashes involving
15 tractor-trailers out of 285,477 total crashes in Illinois;
16 fatalities resulting from tractor-trailer crashes increased by
17 13% from 2012 to 2013, and the number of fatal crashes
18 involving tractor-trailers also increased by 16%; and

19 WHEREAS, From 2009 to 2013, there were 586 fatalities
20 resulting from crashes involving large trucks; and

1 WHEREAS, Annual truck crash fatalities nationwide are
2 equivalent to a major airplane crash every other week of the
3 year; and

4 WHEREAS, In fatal 2-vehicle crashes between a large truck
5 and a passenger motor vehicle, 96% of the fatalities were
6 occupants of the passenger vehicle; and

7 WHEREAS, Driving a truck is one of the most dangerous
8 occupations in the United States; and

9 WHEREAS, An April 2014 survey found that 73% of Illinois
10 residents oppose increasing the current federal truck weight
11 limit of 80,000 pounds to 97,000 pounds; and

12 WHEREAS, Increases to truck size and weight limits would
13 have a tremendous impact on Illinois' infrastructure; Illinois
14 has the third-largest interstate system in the United States
15 and the third-largest bridge inventory in the United States,
16 and more than 7,200 trucking establishments within Illinois use
17 the extensive network of highways; and

18 WHEREAS, At present, nearly 16% of the bridges in Illinois
19 are structurally deficient or functionally obsolete and 15% of
20 the major roads are considered to be in poor condition;
21 increasing the weight of a heavy truck by only 10% increases

1 bridge damage by 33%; and

2 WHEREAS, Driving on roads in need of repair costs Illinois
3 motorists \$3.7 billion a year in extra vehicle repairs and
4 operating costs, which amounts to nearly \$450 per motorist;
5 therefore, be it

6 RESOLVED, BY THE SENATE OF THE NINETY-NINTH GENERAL
7 ASSEMBLY OF THE STATE OF ILLINOIS, that we oppose an increase
8 in current truck size and weight limits on all roads in the
9 State of Illinois in order to ensure the safety of all Illinois
10 motorists on our streets and highways; and be it further

11 RESOLVED, That we affirm our opposition to removing or
12 weakening the federal freeze on Longer Combination Vehicles
13 contained in the Intermodal Surface Transportation Efficiency
14 Act of 1991, which restricts the use of extra-long double and
15 triple trailer trucks on Illinois highways because of the
16 adverse impact on highway safety and infrastructure; and be it
17 further

18 RESOLVED, That suitable copies of this resolution be
19 delivered to the President and Vice President of the United
20 States, the Speaker of the United States House of
21 Representatives, the Majority Leader of the United States
22 Senate, and the members of the Illinois congressional

09900SR0233 Enrolled

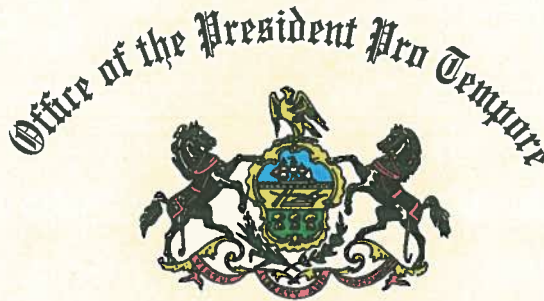
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1 delegation.

25TH DISTRICT
JOE SCARNATI

SENATE BOX 203025
HARRISBURG, PA 17120-3025
(717) 787-7084
FAX: (717) 772-2755
www.senatorsarnati.com



Senate of Pennsylvania

June 5, 2015

DISTRICT OFFICES

BROCKWAY OFFICE:
410 MAIN STREET
BROCKWAY, PA 15824
(814) 265-2030
FAX (814) 265-2040

KANE OFFICE:
21A FIELD STREET
KANE, PA 16735
(814) 837-1026
FAX (814) 837-1029

WELLSBORO OFFICE:
5 MAIN STREET
WELLSBORO, PA 16901
(570) 724-5231
FAX (570) 723-5119

TOLL FREE: 1(877) 787-7084

The Honorable Michael Doyle Jr.
239 Cannon House Office Building
Washington, DC 20515-0001

Dear Representative Doyle:

On behalf of the 25th and 41st State Senatorial Districts, we request that no federal action be taken now to modify or increase truck size and weight limits. To do so before release, review and thorough discussion of the pending US Department of Transportation's Truck Size and Weight Study, as mandated by the Moving Ahead for Progress in the 21st Century Act, is both unnecessary and short circuits a complete understanding of the impacts to the roadway and road bridges across the Commonwealth.

According to 2014 Federal Highway Administration (FHWA) reports, Pennsylvania has a total of 9,420 of its roadway bridge structures that are considered either structurally deficient or functionally obsolete. This is over 41 percent of the total number of Pennsylvania bridges in the FHWA report. In 2013 Pennsylvania Department of Transportation (PennDOT), along with local bridge owning authorities, added new weight restrictions or lowering existing weight restrictions on approximately 1,000 bridges statewide.

We appreciate that certain sectors of the trucking industry are seeking to boost their efficiencies, and profits, through a federal mandate for larger trucks. However, Congress should resist simply agreeing to such requests until the significant public safety and environmental impacts associated with such changes are fully understood and discussed. Also, a clear understanding of the costs of increase truck size and weight limits will impose on PennDOT and local government authorities should also be developed before implementing such changes.

For all these reasons, we ask that no truck size or weight legislation be included in the 2014 appropriations bill now under consideration in Congress.

Sincerely,

Joe Scarnati
State Senator – 25th District

Don White
State Senator – 41st District



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

June 1, 2015
(House Rules)

STATEMENT OF ADMINISTRATION POLICY
H.R. 2577 — Transportation, Housing and Urban Development, and Related Agencies
Appropriations Act, 2016
(Rep. Rogers, R-KY)

The Administration strongly opposes House passage of H.R. 2577, making appropriations for the Departments of Transportation, Housing and Urban Development, and related agencies for the fiscal year ending September 30, 2016, and for other purposes. The bill freezes or cuts critical investment in transportation that creates jobs, helps to grow the economy, and improves America's roads, bridges, transit infrastructure, and aviation systems, benefiting towns and cities across the United States, as well as investments in ending homelessness, strengthening communities, and providing rental housing assistance for poor and vulnerable families. At a time when only one in four families who are eligible for housing assistance actually receives it, the bill would set back efforts to end homelessness and shortchange housing support for very low-income households, including families with children, the elderly, and the disabled. The bill also reduces funding for other vulnerable populations, such as low-income children at risk of lead poisoning, and for programs that invest in public housing to revitalize distressed communities. Furthermore, the legislation includes highly objectionable provisions, including provisions that would restrict travel to Cuba, undercut public safety, and limit State and local choices to enhance passenger rail. If the President were presented with H.R. 2577, his senior advisors would recommend that he veto the bill.

Enacting H.R. 2577 and adhering to the congressional Republican budget's overall spending limits for fiscal year (FY) 2016 would hurt our economy and shortchange investments in middle-class priorities. Sequestration was never intended to take effect: rather, it was supposed to threaten such drastic cuts to both defense and non-defense funding that policymakers would be motivated to come to the table and reduce the deficit through smart, balanced reforms. The Republican framework would bring base discretionary funding for both non-defense and defense for FY 2016 to the lowest real levels in a decade. Compared to the President's Budget, the cuts would result in tens of thousands of the Nation's most vulnerable children losing access to Head Start, more than two million fewer workers receiving job training and employment services, and thousands fewer scientific and medical research awards and grants, adversely impacting the pace of discovery and innovation, along with other impacts that would hurt the economy, the middle class, and Americans working hard to reach the middle class.

Sequestration funding levels would also put our national security at unnecessary risk, not only through pressures on defense spending, but also through pressures on State, USAID, Homeland Security, and other non-defense programs that help keep us safe. More broadly, the strength of our economy and the security of our Nation are linked. That is why the President has been clear that he is not willing to lock in sequestration going forward, nor will he accept fixes to defense without also fixing non-defense.

The President's senior advisors would recommend that he veto H.R. 2577 and any other legislation that implements the current Republican budget framework, which blocks the investments needed for our economy to compete in the future. The Administration looks forward to working with the Congress to reverse sequestration for defense and non-defense priorities and offset the cost with commonsense spending and tax expenditure cuts, as Members of Congress from both parties have urged.

The Administration would like to take this opportunity to share additional views regarding the Committee's version of the bill.

Department of Transportation (DOT)

Surface Transportation Funding. The Administration strongly opposes the reductions in funding for surface transportation programs, which would essentially preclude new investments while freezing or reducing most major capital accounts below prior-year funding. The President's FY 2016 Budget request is a fully-paid-for plan for six years of increased investment in America's infrastructure. The \$478 billion multimodal proposal includes essential program improvements that would improve safety, support critical infrastructure projects, and create jobs while improving America's roads, bridges, transit systems and railways in cities, fast-growing metropolitan areas, small towns and rural communities across the United States. The Administration looks forward to working with the Congress to enact the GROW AMERICA proposal.

Amtrak and Rail Safety. The Administration strongly urges the Congress to support the President's FY 2016 Budget request for current passenger rail service, totaling nearly \$2.5 billion, and fully fund the request for the Federal Railroad Administration's (FRA) Safety and Operations account. The requested funding for passenger rail service would help bring Amtrak's Northeast Corridor infrastructure and equipment into a state of good repair, implement Positive Train Control on Amtrak routes, and support rail service at a time of record ridership. Rather than including funds for those critical investments, the bill reduces Amtrak grants by more than \$1.3 billion below the FY 2016 Budget request and \$250 million below last year's level. In addition, the bill holds FRA's Safety and Operations account flat at FY 2015 levels, denying resources for additional safety inspectors and other improvements.

Restricting Travel to Cuba. The Administration strongly objects to language in sections 193 and 414 that would restrict flights and cruise ships from going to Cuba and would place unnecessary restrictions on options for educational, religious, or other permitted travel to Cuba.

Transportation Investment Generating Economic Recovery (TIGER) Grants. Compared to the FY 2016 Budget request, the bill would reduce funding for competitive TIGER grants by over a billion dollars, reducing TIGER funding to about 80 percent below the lowest level since the program began in FY 2009. This is despite the fact that the program is vastly oversubscribed due to strong State and local interest, supports some of the most transformative highway, port, and transit projects in the United States, and helps State and local partners leverage public and private dollars.

Federal Transit Administration (FTA) Capital Investment Grants. The Administration strongly urges the Congress to fund the requested \$3.25 billion for the FTA Capital Investment Grant

Program, which provides a share of funding for locally planned, implemented and operated transit capital investments that improve capacity in communities nationwide.

High Speed Rail. The Administration also strongly objects to language in section 192 of the bill prohibiting the Surface Transportation Board from taking any action to approve subsequent phases of the California High Speed Rail project between Los Angeles and San Francisco unless the Surface Transportation Board issues a permit for the entire project. The Administration believes passenger rail can play an important role in addressing transportation needs in many parts of the Nation and opposes any attempts to limit State and local choices to enhance passenger rail.

Infrastructure Permitting Center. The Administration is concerned that the bill does not provide the requested funding level of \$4 million for the Interagency Infrastructure Permitting Improvement Center, which is essential for developing and implementing reforms that will accelerate and improve the permitting and review of major infrastructure projects. These funds are also critically needed to develop and deploy information technology tools to help track project metrics and schedules that will lead to greater accountability and transparency.

Federal Aviation Administration's (FAA) Facilities and Equipment account. The bill provides \$2.5 billion for the FAA Facilities and Equipment account, \$355 million below the FY 2016 Budget request and the lowest funding level in 15 years, even before taking into account inflation. At this level, the FAA would be hampered in its ability to maintain the capacity and safety of the current National Airspace System and would be required to slow the modernization of the Nation's air traffic system through NextGen—the next generation of air traffic control technology. Continuing to defer maintenance would deteriorate the current air traffic control system, and coupling that deterioration with delaying NextGen could lead to worsening air traffic delays and higher replacement costs in the future.

Washington Metropolitan Area Transit Authority (WMATA). The Administration is strongly concerned about the dramatic reduction in funding for transit services in the Nation's capital. The bill would reduce funding for WMATA from the FY 2016 Budget request of \$150 million, which is consistent with enacted appropriations for FY 2015 and previous years, to \$100 million. These reductions could jeopardize the safety improvements that WMATA is in the process of making.

Safe Transport of Energy Products. The Administration is concerned that the bill does not provide adequate funding for the Department to continue and further its focus on the safe movement of energy products throughout the transportation system by supporting enhanced inspection levels, investigative efforts, research and data analysis and testing in the highest risk areas. The Administration appreciates that the bill provides an increase of \$8 million for the Hazardous Materials Safety account. However, holding the Federal Railroad Administration's Safety and Operations account flat at FY 2015 funding levels inhibits its ability to hire critically needed safety inspectors to focus on the movement of crude oil across the Nation.

Highway and Motor Carrier Safety. The Administration strongly objects to language in sections 124, 125, 126, and 132 that would undercut public safety, including by letting the trucking industry avoid truck size and weight limits and by preventing data-driven changes that would improve safety for all travelers by addressing truck driver fatigue ("Hours of Service"). In

particular, section 132 would undermine the Administration's existing regulatory work to ensure appropriate standards for commercial truck drivers' rest. The bill imposes criteria that would in all likelihood be impossible to meet, therefore preventing critical safety provisions from taking effect. This provision combined with the troubling changes to truck size and weight limit could significantly compromise safety on our Nation's roads.

Digital Accountability and Transparency Act of 2014 (DATA Act). The Administration urges the Congress to fully fund the FY 2016 Budget request for DOT to implement the DATA Act. This funding will support the Department's efforts to provide more transparent Federal spending data, such as updating information technology systems, changing business processes, and employing a uniform procurement instrument identifier.

U.S. Digital Service Team. The Administration urges the Congress to fully fund the FY 2016 Budget request for DOT to develop a U.S. Digital Service team. This funding will support the Department in managing the agency's digital services that have the greatest impact to citizens and businesses.

Department of Housing and Urban Development (HUD)

Housing Choice Vouchers. The Administration strongly objects to the \$19.9 billion in funding provided for the Housing Choice Vouchers program. This funding level is \$1.2 billion less than the FY 2016 Budget request and fails to restore the 67,000 vouchers lost due to the FY 2013 sequestration, is insufficient to renew 28,000 existing vouchers, and does not provide full funding for tenant protection needs. The bill also provides inadequate funding for the Voucher program's administrative fees so that Public Housing Authorities can ensure that units are safe and habitable. These reductions are only more problematic in light of new research released recently that found large positive effects of housing vouchers on long-term educational and earnings outcomes for young children.

Choice Neighborhoods. The Administration strongly opposes the \$20 million funding level provided for Choice Neighborhoods, a key part of the President's Promise Zones initiative to accelerate economic mobility and revitalization in high-poverty communities. This reduction of 75 percent from the FY 2015 level and \$230 million below the President's FY 2016 Budget request would leave the program unable to fund even a single implementation grant at the average current grant size, leaving dozens of distressed communities untouched. This reduction is particularly problematic given how recent research mentioned above and events in Baltimore and other communities make clear the negative consequences of concentrated poverty for children.

Homeless Assistance Grants. The Administration strongly opposes the funding level for Homeless Assistance Grants, which is \$295 million below the FY 2016 Budget request. Since FY 2010, the Administration has made substantial progress toward the goal of ending homelessness; the bill would set back these efforts, supporting 15,000 fewer homeless or at-risk families with rapid rehousing and 25,500 fewer units of permanent supportive housing targeted to the chronically homeless.

Federal Housing Administration (FHA) Administrative Fee and Funding. The Administration urges the Congress to adopt the proposed new fee on FHA lenders and provide the full FY 2016 Budget request of \$174 million for FHA administrative expenses. The request would lower

taxpayer risks and improve access to mortgage credit for underserved borrowers by enabling FHA to both strengthen and clarify its lender oversight and compliance policies.

HOME/Housing Trust Fund (HTF). The Administration strongly opposes the \$767 million funding level for HOME, a reduction of more than \$130 million from its FY 2015 funding level, and the bill's diversion of anticipated HTF collections to the HOME program. By transferring funds from HTF to HOME, the bill effectively eliminates the HTF program, and provides \$283 million, or 24 percent, less than the FY 2016 Budget request for these two programs. The Administration strongly urges the Congress to support HOME and the HTF, as each program complements the work of local leaders to develop affordable housing for both extremely low- and low-income families.

Housing Counseling. The Administration opposes the \$47 million in funding for HUD's Housing Counseling program, which is \$13 million, or 22 percent, below the FY 2016 Budget request. Housing counseling is an important resource in helping households achieve sustainable homeownership or find quality, affordable rental housing.

Lead Hazard and Healthy Homes. The Administration strongly opposes the \$75 million funding level for HUD's Office of Lead Hazard Control and Healthy Homes. This level, which is more than 30 percent below its FY 2015 funding level and \$45 million below the FY 2016 Budget request would result in at least 3,400 fewer low-income children receiving lead hazard control in their homes.

Public Housing Programs. The Administration opposes the \$6.1 billion in funding provided for the Public Housing Operating Fund and Capital Fund programs. This funding level is \$449 million below the FY 2016 Budget request, and would delay necessary maintenance and capital improvements that would improve the deteriorating living conditions of low-income families. The Administration also urges the Congress to provide the \$50 million requested for the Rental Assistance Demonstration (RAD) and to eliminate the 185,000 unit cap on RAD to preserve additional underfunded public housing properties at risk of loss, by converting them to long-term Section 8 contracts.

Information Technology (IT) and Digital Services. The Administration strongly opposes the \$100 million appropriation for HUD's Information Technology Fund, \$234 million below the FY 2016 Budget request. This funding level provides HUD with less than half of the necessary funding for basic IT operations and would likely require shutdown of core IT systems as well as cancellation or deferral of all development, modernization and enhancement projects, putting every element of HUD's core mission at risk. Further, the failure to fund a U.S. Digital Service team represents a missed opportunity to improve key agency services and programs that impact the public.

Technical Assistance and Research. The Administration urges the Congress to provide sufficient funding for technical assistance and research, which are critical to support effective operation of HUD programs and inform sound policymaking. The bill provides no funding for technical assistance and only \$52.5 million for research, which in total is \$77.5 million below the FY 2016 Budget request.

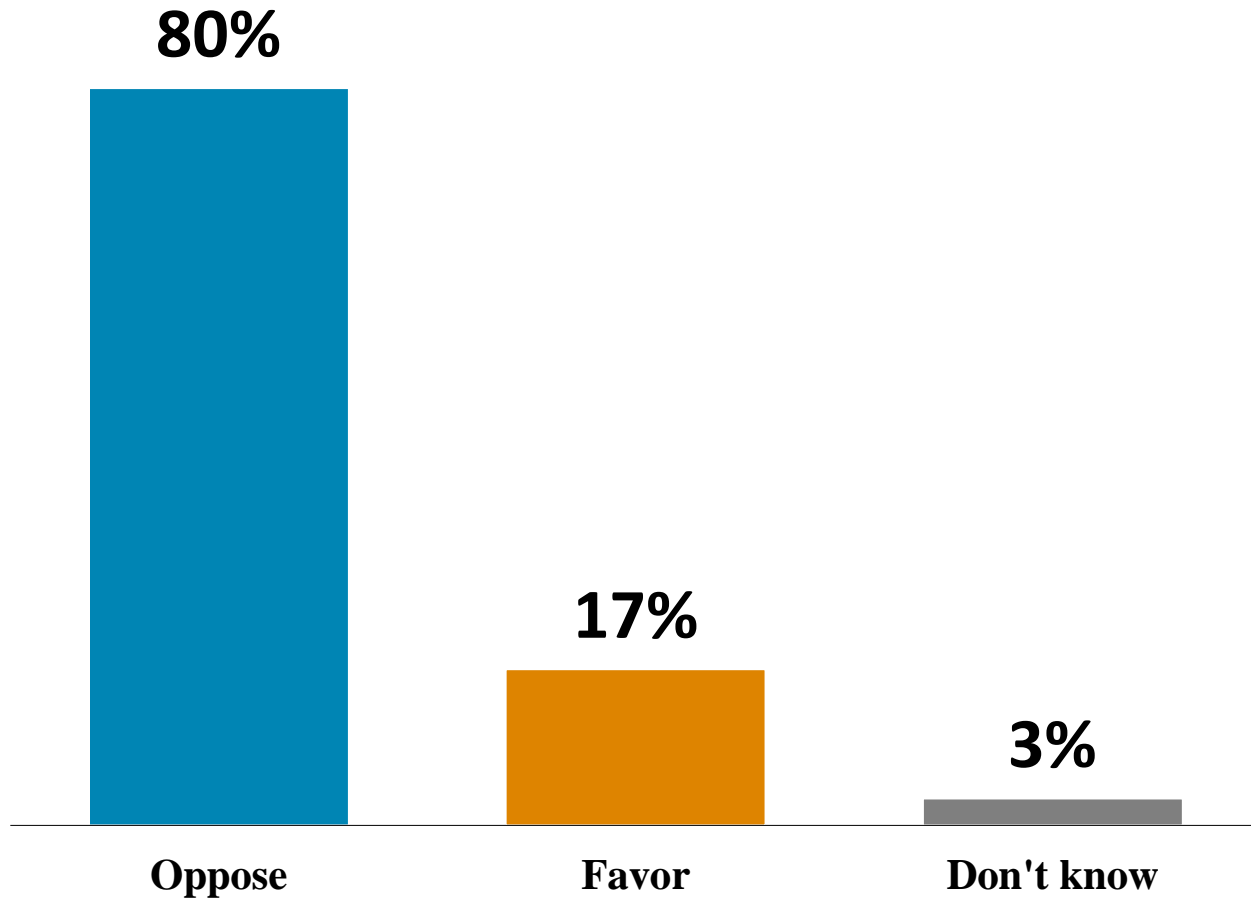
Energy Efficiency Requirements in HUD-Assisted Housing. The Administration opposes the inclusion of language in section 232 that would undermine Federal energy efficiency

requirements in HUD-assisted housing by prohibiting the use of FY 2016 funding to require energy efficiency standards in HUD-funded construction that exceed that of State or local building codes.

The Administration looks forward to working with the Congress as the FY 2016 appropriations process moves forward.

* * * * *

American Public says “NO” to More Working & Driving Hours for Truck Drivers



**U.S. Department of Transportation's
Federal Motor Carrier Safety Administration**

Debunking the Myths on Federal Hours-of-Service (HoS) Rules for Truck Drivers

Myth: *FMCSA has applied a one-size-fits-all Hours-of-Service rule and refused to provide any flexibility or options for relief from the regulation for the affected industries.*

Fact: As authorized by Congress, FMCSA carefully considers and collects public comments on all applications for exemptions from federal regulations -- including the Hours-of-Service rules for truck drivers. An exemption provides a person or class of persons with relief from the regulations for up to two years, and may be renewed. To-date, FMCSA has received four petitions for exemptions, which addressed only the 30 minute break requirement of the HoS rule. Two of the petitions have been granted: (1) for carriers of the livestock industry, and (2) for the U.S. Departments of Defense and Energy contractors.

FMCSA has no authority to issue an exemption unless an application is first submitted to the Agency. Not a single party or segment of the trucking industry has even applied for an exemption from the new restrictions on the 34-hour restart.

Myth: *There was no need to update the Hours-of-Service rule.*

Fact: Nearly 4,000 people die in large truck crashes each year and driver fatigue is a leading factor. In 1995 and again in 1999, Congress directed the U.S. Department of Transportation to address fatigue-related motor carrier safety issues. Through a series of rulemakings, FMCSA attempted to do so but was embroiled in litigation – from both sides -- for almost a decade, creating uncertainty for the industry.

In 2011, after years of research and public input from industry and safety advocates, FMCSA finalized the rule that took effect on July 1, 2013 and is in place today. In August 2013, the U.S. Court of Appeals for the District of Columbia Circuit upheld the current hours-of-service rules, after twice overturning previous versions. The Court said, "...our decision today brings to an end much of the permanent warfare surrounding the HOS rules."

Myth: *The latest rule was put into place without proper research, study or public input.*

Fact: All rules implemented by the Federal government are implemented only after proper research, study, and public input is completed. Before finalizing the current Hours-of-Service rules, FMCSA held six public listening sessions and an online question and answer forum, and it carefully considered approximately 21,000 formal docket comments that were submitted from drivers, carriers, state law enforcement, safety advocates and industry associations.

The 2011 final rule lists 80 sources of scientific research and data the Agency reviewed and considered, and the Regulatory Impact Analysis cited nearly 50 scientific sources. All of this was on top of hundreds of studies regarding fatigue and hours of work that were considered in past HOS rulemakings, including research on the appropriateness and value of a "restart."

Myth: *There is no scientific basis for the current, more restrictive 34-hour restart provision in the current rule.*

Fact: The FMCSA limited use of the 34-hour restart in the new rule to once every 168 hours (or one seven-day periods) based on the extensive body of research that shows the consequences of long work hours on driver health, and the correlation between long weekly work hours and a higher risk of sleep loss and crashes.

The CDC's National Institute for Occupational Safety and Health published a comprehensive study in April 2004 entitled "Overtime and Extended Work Shifts: Recent Findings on Illnesses, Injuries, and Health Behaviors" [Caruso, C.C., et al. (2004)]. The NIOSH report documents published research on long work hours (greater than 8 hours work per day) and an extended work week (greater than 40 hours per week). This scientific review generally concluded that long work hours were associated with poorer health, increased work-related and non-work related injury rates, increased illness, a greater risk of unhealthy weight gain, cardiovascular disease, increased alcohol use, increased smoking, poorer neuropsychological performance, reduced vigilance on task measures, reduced cognitive function, reduced overall job performance, slower work, and decreased alertness and increased fatigue -- particularly during in the 9th to 12th hours of work.

Subsequent to publication of the 2011 rule, a third-party field study -- one of the largest ever conducted using commercial motor vehicle drivers -- confirmed the importance of limiting use of the 34-hour restart. The naturalistic field study to measure fatigue among commercial motor vehicle drivers concluded that the current 34-hour restart provision requiring two periods of rest from 1-5 a.m. is more effective at combatting fatigue than the previous version, which did not. This research was peer-reviewed to ensure the methodology and results were solid.

In this study, researchers measured sleep, reaction time, subjective sleepiness and safe driving performance, and found that drivers who began their work week with just one nighttime period of rest, as compared to the two nights in the updated 34-hour restart break:

- Exhibited more lapses of attention, especially at night;
- Reported greater sleepiness, especially toward the end of their duty periods; and
- Showed increased lane deviation in the morning, afternoon and at night.

Myth: *All truck drivers are negatively impacted by the updated rule. The Senate Appropriations amendment fixes this.*

Fact: A driver is never required to use the 34-hour restart. A 34-hour restart is only necessary if a long-haul truck driver wants to work longer than 60 hours in 7 days or 70 hours in 8 days. Less than 15 percent of long-haul truck drivers -- those who work the most extreme schedules -- are even impacted by the current rule, according to the Regulatory Impact Analysis for the 2011 Hours of Service rule. Those averaging 70 hours per week or less are not affected by the changes to the 34-hour restart because they would never work the number of hours that would require them to use the restart under the current rule. However, any carrier that previously allowed or required its drivers to average up to 82 hours per week -- which was allowed under the old rule -- is now required to stop this practice.

The Senate amendment would allow drivers to return to the extreme schedules allowed under the pre-July 2013 rule, when a company could require a driver to work a maximum average of up to 82 hours, week, after week, after week.

Working long daily and weekly hours on a continuing basis is associated with cumulative fatigue, a higher risk of crashes and a number of serious chronic health conditions in drivers.

Myth: *Crashes, injuries and fatalities were lower under the old Hours-of-Service rule.*

Fact: While the rate of fatal crashes involving large trucks per 100 million vehicle miles traveled decreased each year from 2005 through 2009, it rose, along with increased demand for freight shipping, from 2009 through 2012.

Myth: *The Hours-of-Service rule is hurting a trucker's ability to make money and trucking companies' bottom lines.*

Fact: This rule has been in place almost a full year; a year in which the industry has seen higher profitability than any year since 2009. Only those drivers who were working more than 70 hours per week may be affected by having their work limited to an average of 70 hours per week, which is still nearly double the national standard of a 40-hour work week.

Myth: *The Hours-of-Service rule discriminates against nighttime drivers and forcing them to be on the road during the day and prime rush hours.*

Fact: There is no body of evidence to support this claim, and supply chain professionals demand their trucking suppliers to make full use of the 24-hour day to move freight throughout our country. Many of the regular nighttime drivers are in the less-than-truckload segment and already take full weekends off, which automatically give them two nights off-duty.

This rule also does not prevent carriers and drivers from setting their own schedules, nor does it restrict drivers from being on the roads during any time of the day. Only drivers who run out of time during the work week (i.e., exceed 60 hours of work in 7 days or 70 hours in 8 days) and need to begin a new work week as soon as possible would have to use the 34-hour restart, including two nighttime periods from 1-5 a.m. Even then, there is no requirement that such a driver "hit the road" at 5 a.m.

Carrier selection to meet shipper needs has always been a factor in the highly mobile, highly competitive trucking industry. Finally, with less than 15 percent of long haul truck-drivers affected by the 34-hour restart, and many with variable schedules, the impact to morning rush hour would be statistically insignificant due to the distribution of these drivers across the country and the amount of other traffic already on the road.

Myth: *The rule's drive-time restrictions are forcing some drivers to shut down their trucks when they're just a few miles from their destinations.*

Fact: The 2011 final rule did not change the daily driving time limits or on-duty limits. Drivers have always been required to cease operations when they run out of time. No matter what the limits on driving and work hours are, if the motor carrier and driver plan the schedule so tightly that the driver can barely complete the run legally, this problem will occur.

Myth: *This rule is exacerbating the driver shortage.*

Fact: As the economy strengthens and demand increases, more truckers are needed to transport freight. However, high driver turnover is endemic in the trucking industry due to the difficult working conditions, low wages and the demands of the job. The American Trucking Associations determined that in 2013, driver turnover averaged 96 percent compared to 2005 when it reached an all-time high of 130 percent. Shortages of drivers, when and where they do exist, depend more on salaries and working conditions than on other factors.



Parents Against Tired Truckers and Citizens for Reliable and Safe Highways

Minimum Insurance Levels for Motor Carriers Need to be Increased

- Minimum levels of insurance for trucks have not been increased in over 35 years and are woefully insufficient.
- Consequently a large portion of the damages and losses caused by motor carriers at or near the minimum is imposed upon the American motoring public.
- The underinsured segments of the industry are effectively subsidized by American taxpayers through unreimbursed social welfare programs including Medicaid and Social Security.
- If all of the industry were required to absorb more of the losses they cause, significant changes in the industry would occur, resulting in safer highways for all.

Background

In 1980, as Congress deregulated the trucking industry, there was great concern regarding the imminent increase in the number of trucking companies that was sure to follow the removal of the barriers to entry into the industry. Congress believed it would be difficult for the federal regulators, alone, to provide effective oversight for safe operations for such a large number of companies. Congress intended the Secretary of Transportation to set insurance minimums at a level significant enough to provide an appropriate means of compensation to truck crash victims if crashes occurred and also to cause the insurance companies to provide effective, on site underwriting so that the insurance market would provide incentives for safe operations of motor carriers.

Congress set the absolute minimum level of insurance to be applied to motor carriers of property and of hazardous materials at \$750,000 and \$5,000,000, respectively, and gave the Secretary of Transportation authority to increase such amounts to appropriate levels that would achieve the intended purpose. Unfortunately, the minimum amounts set by Congress as the absolute floor were too low to provide the intended underwriting supervision and too low to provide protection for the public. Nonetheless, in spite of an exponential growth of the number of authorized motor carriers (approximately 27,000 prior to deregulation compared to more than 500,000 in existence today), the Secretary has never increased the bare minimums set by Congress, and the low original minimum amounts, over the past 30 years, have provided less and less of an incentive to operate safely and have become almost insignificant when compared to the damages caused by the huge trucks now allowed on public highways. Indeed, most “minimum” policies are already written at the \$1,000,000 level because the \$750,000 amount is so absurdly low.

Crash Costs

When the above numbers were set as part of the deregulation process, the amounts were considered to be absolute minimums necessary for protection of the public. Since then, not only have all of the expenses associated with truck crashes increased dramatically, the sheer disparity in size between cars and trucks has increased resulting in more severe crashes. In that same time, trailers were allowed to expand first to 48’ in length, and then to 53’. Truck weight increases, both across the board and through exemptions, have also occurred. Combined with the increase in crash expenses and damages, such as lost income and medical expenses, the lack of any adjustment since 1980 has caused a greater disparity between the original amount and current costs.

The common approach by an insurance company for a trucking company with only the required minimums in liability coverage, when the trucking company causes a catastrophe with damages that far

exceed the insurance, is to “interplead” the insurance limits. This is done by the insurance company suing all of the people injured and the families of those killed in one suit, with the insurance company offering to pay the ridiculously low limits of the policy into court and to require those injured and those who have lost loved ones to fight (or “interplead”) among themselves as to who should get what. The number of interpleader actions has risen dramatically as the required minimum insurance levels have fallen significantly short of the damages actually caused by truck crashes.

The effect of the lack of adequate insurance is that the damages caused by certain segments of the industry are not borne by those causing them. The damage caused by the underinsured are spread out among the innocent motorists who are killed and injured, who frequently have no effective recourse against the companies that caused their losses.

A common type of truck crash involves a fatigued truck driver who crashes into traffic that has stopped on the highway due to congestion, a prior crash or a construction zone. These crashes typically involve multiple vehicles, multiple deaths, and multiple injuries. The total damages caused in such cases can easily exceed \$20,000,000, but an insurance company with minimum limits will simply sue everyone involved in an interpleader action and the unprotected crash victims are left to do the best with what they have to try to put their lives back together. Frequently, the injured and disabled end up relying on Medicaid, Social Security or other government programs because smaller trucking companies do not have to pay for the cost of the damages they cause. This amounts to a taxpayer subsidy for the companies that don’t carry enough insurance to cover the damages they cause, while adequately insured companies bear such expenses as part of their business.

Unfair Competition

The low limits allowed by law are frequently carried by trucking companies that have minimal owned assets; companies that lease their terminals and equipment or otherwise leverage their operations. Even if an injured person obtains a legal judgment in excess of the low insurance limits, the companies have simply gone out of business and the owners have started up a new business under another name. This dangerous practice, referred to as reincarnating or chameleon carriers, was described in a July 2009 report by the GAO.

Larger, nationwide companies, which are adequately capitalized on the other hand, have much higher limits. It is common for the larger carriers to carry multiple layers of coverage, sometimes with a significant self-insured retention, with totals exceeding \$30,000,000. These companies carry adequate amounts because they have “something to lose” and they know too well the significant damages that can be caused when a commercial truck hits a passenger vehicle or vehicles.

The larger companies have significant incentive to make their operations as safe as possible rather than simply gamble against the risk of a catastrophic crash. As a result, they have higher insurance overhead costs to protect against potential losses, yet they have to compete with companies that have nothing to lose (and others willing to put the public at risk) that carry the minimum basic coverage. The companies with “nothing to lose” are effectively subsidized by the victimized motoring public and government programs that absorb the uninsured losses. The low limits, then, create exactly the opposite effect that minimum insurance levels were intended to provide. Rather than increasing overall safety within the industry by creating an economic incentive to operate safely, the low levels create a more dangerous situation through unfair competition by allowing the losses of the most irresponsible companies to be subsidized by the public while responsible companies pay the full amount of the damages they cause.

Minimums That Should be Required

The industry should have to absorb the losses it causes. Crashes involving multiple deaths and injuries, along with any property/infrastructure damage, with total combined damages far exceeding the current minimums happen every week. In order for the minimums to serve the purpose for which they were intended, the limits need to be set sufficiently high to give the insurance companies a reason to set realistic underwriting standards that would reward safe companies and identify unsafe operations. The limits should also reflect the real devastation and damages that are caused when an 80,000 pound truck slams into traffic stopped or slowed in a construction zone. In order to have these effects, property-carrying motor carriers should be required to carry at least \$10,000,000 per occurrence and transporters of hazardous materials and people should be required to carry at least \$15,000,000 worth of coverage.

FMCSA Report on Minimum Financial Responsibility

In April 2014, the Federal Motor Carrier Safety Administration (FMCSA) released a report on its review of minimum financial responsibility that found current levels to be inadequate. It found that costs for severe and critical injury crashes can easily exceed \$1 million. The study only identified a small number of crashes that exceeded minimum insurance levels due to the lack of available settlement data. Insurance settlements for amounts that exceed the minimum levels often contain a nondisclosure agreement, and this information is not publicly available. In summary, the report noted that current limits do not adequately cover catastrophic crashes and acknowledged that medical care inflation would increase levels to at least \$3.2 million.

Findings From Other Reports on Minimum Financial Responsibility

- Pacific Institute for Research and Evaluation (PIRE) - This report found that the upper range for liability awards involving death or catastrophic injury is \$9–10 million, and recommended that DOT set limits per crash of at least \$10 million.
- Trucking Alliance Review of Crash Settlements - Member companies of the Trucking Alliance voluntarily tracked 8,692 accident settlements between 2005 and 2011. According to the Trucking Alliance, 42 percent of the injury claims could have had no avenue for offsetting all medical costs.

ANPRM

On November 28, 2014, FMCSA issued an advanced noticed of proposed rulemaking (ANPRM) to evaluate options for increasing the level of minimum insurance requirements and for future rulemaking

Conclusion

Congress' concern of an explosion in the number of motor carriers and the consequential inability of regulation and enforcement to keep our highways safe has become a reality. The intended protective mechanism of federally-required minimum levels of insurance, however, has never adequately performed its intended function. The amount was never set at a sufficiently high level to require insurance companies to seriously underwrite motor carriers and require safe operations before agreeing to insure them and, over time, the minimum amount has become totally inadequate. Death and catastrophic injuries have become accepted as part of the cost of doing business, with most of that cost being shifted to non-industry members of the motoring public and to the American taxpayers. **The Secretary of Transportation has the authority and the responsibility to ensure the Congressional intent of the required financial responsibility is achieved. The Secretary should exercise his authority in this regard and set the minimums at responsible levels that will encourage safe underwriting and safe operations as was intended by Congress.**



Truck Crash Fatalities

State	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Alabama	171	160	152	172	158	161	159	145	128	147	163	122	137	134	131	80	114	100	107	109
Alaska	5	8	6	7	2	5	4	10	8	5	14	5	4	4	5	3	7	0	4	4
Arizona	94	90	98	73	125	108	105	85	104	119	106	118	136	98	98	66	65	68	85	63
Arkansas	91	102	104	135	109	96	118	98	98	109	110	115	91	114	76	79	83	88	91	83
California	386	433	390	409	378	363	374	378	362	370	415	429	394	366	318	275	236	282	254	243
Colorado	61	53	63	80	61	71	68	95	53	77	69	68	67	82	68	40	49	51	58	56
Connecticut	27	29	34	25	28	21	34	29	18	24	25	21	29	28	24	13	23	14	16	19
Delaware	11	9	14	17	17	11	20	15	17	19	18	7	17	6	7	11	9	10	9	10
DC	2	1	4	4	1	2	2	1	0	0	5	3	2	2	1	1	3	2	1	3
Florida	310	290	305	308	352	349	310	365	376	365	377	400	350	301	264	181	181	213	213	197
Georgia	214	201	220	254	223	248	219	255	198	232	248	229	232	229	180	153	153	174	153	163
Hawaii	5	3	13	3	3	3	2	8	4	4	4	9	12	3	6	5	4	3	6	7
Idaho	38	38	40	34	28	31	26	34	32	40	29	34	29	27	30	20	15	21	13	35
Illinois	178	171	152	166	184	211	173	200	156	194	158	191	159	154	146	88	112	122	122	142
Indiana	157	165	166	158	181	205	163	135	131	156	157	138	140	147	137	96	115	136	112	116
Iowa	77	88	84	89	92	112	90	83	68	77	70	73	75	71	73	65	88	60	60	61
Kansas	59	68	64	96	86	96	81	80	79	71	94	80	69	77	63	59	86	65	64	68
Kentucky	109	106	100	115	112	94	101	107	122	119	124	124	105	104	113	112	100	88	82	78
Louisiana	119	97	107	132	157	131	126	123	114	130	100	122	104	121	111	83	107	80	108	84
Maine	27	28	15	23	23	25	30	28	22	14	21	19	21	21	23	22	14	17	11	18
Maryland	79	59	70	84	63	54	63	78	63	62	83	60	61	69	52	50	44	39	66	59
Massachusetts	45	36	39	39	35	37	51	30	24	35	41	24	34	28	23	20	19	35	18	30
Michigan	186	172	162	150	159	139	156	122	135	117	109	111	116	124	88	67	85	61	73	88
Minnesota	88	78	77	102	87	91	89	64	86	68	73	70	62	86	70	59	90	52	60	75
Mississippi	98	123	99	106	130	118	123	98	83	72	101	91	90	75	70	61	55	73	51	63
Missouri	148	97	167	158	183	178	183	139	154	167	158	166	155	136	124	86	84	101	92	85
Montana	20	30	21	27	21	19	26	27	26	27	16	23	34	31	25	24	14	31	11	20
Nebraska	52	45	63	53	43	59	56	68	59	56	49	48	34	43	43	43	55	31	44	29
Nevada	28	31	44	31	38	44	37	46	32	32	29	53	51	29	22	19	15	35	18	18
New Hampshire	8	10	12	12	10	11	10	14	15	13	15	11	7	12	13	8	6	8	6	13
New Jersey	84	96	86	92	72	60	94	77	72	75	79	98	74	64	47	69	52	53	60	60
New Mexico	44	47	56	53	46	66	52	59	61	50	63	63	80	57	45	36	46	48	42	54
New York	210	149	161	161	143	177	157	139	132	158	140	145	174	155	119	107	120	114	100	118
North Carolina	207	198	183	231	247	201	191	201	169	162	198	204	152	168	162	128	117	117	127	138
North Dakota	9	12	12	12	11	25	10	12	19	16	14	17	19	12	20	31	18	40	48	63
Ohio	222	217	224	220	200	215	189	168	203	151	190	177	158	134	143	114	132	117	152	131
Oklahoma	83	91	99	105	134	103	112	94	130	102	114	121	140	112	115	94	91	112	124	112
Oregon	64	72	64	80	74	49	52	64	55	65	53	66	62	53	37	30	46	50	28	33
Pennsylvania	221	196	185	196	181	227	184	185	174	224	189	183	193	194	192	134	164	160	166	155
Rhode Island	6	3	6	2	3	9	1	6	5	6	5	1	8	7	2	5	2	1	4	5
South Carolina	104	104	111	90	128	118	133	108	101	99	110	124	95	91	85	82	65	89	84	65
South Dakota	17	14	24	20	15	23	22	21	19	17	18	13	19	14	14	16	25	12	20	18
Tennessee	146	129	175	145	125	185	163	138	150	118	155	163	148	149	95	92	92	108	112	126
Texas	412	381	450	455	479	434	513	486	467	487	468	506	500	502	453	318	400	432	573	536
Utah	32	34	36	57	54	43	39	34	44	21	31	32	39	39	29	21	35	22	18	20
Vermont	10	15	10	18	9	11	9	7	10	10	15	9	11	5	7	6	10	6	5	8
Virginia	132	98	121	130	131	107	115	110	100	120	98	112	107	108	81	77	77	76	84	89
Washington	54	75	73	89	72	63	72	63	55	46	57	69	65	79	55	31	30	33	45	40
West Virginia	61	53	60	60	42	65	57	48	65	57	64	55	48	48	47	34	50	34	45	46
Wisconsin	111	96	105	95	107	81	97	108	109	101	107	87	76	85	63	55	56	71	65	83
Wyoming	22	17	16	25	33	25	21	23	32	30	41	31	42	24	30	11	27	26	26	25
National	5,144	4,918	5,142	5,398	5,395	5,380	5,282	5,111	4,939	5,036	5,190	5,240	5,027	4,822	4,245	3,380	3,686	3,781	3,944	3,964



Large Trucks

3,964 people were killed and 95,000 people were injured in crashes involving large trucks in 2013.¹ In the previous 10 years (2004-2013), more than 43,000 people were killed and nearly one million were injured in crashes involving large trucks.² Every year on average, over 4,000 people are killed and nearly 100,000 are injured in large truck crashes.³ Of those killed in 2013, 71 percent were occupants of other vehicles in crashes involving large trucks, 11 percent were non-occupants (pedestrians, pedalcyclists, etc.), and only 17 percent were occupants of large trucks.⁴ ***Large truck crash fatalities increased again from 2012 to 2013.⁵ This follows a 9 percent increase in 2010, a 3 percent increase in 2011 and a 4 percent in 2012, for a combined increase in large truck involved crash fatalities of 17 percent since 2009, while the overall number of traffic fatalities for all motor vehicles declined by 3 percent over that same time.***⁶ Similarly, the number of people injured in large truck involved crashes increased by 28 percent since 2009 while the total number of people injured in all traffic crashes only increased by 4 percent.⁷

LARGE TRUCK SAFETY FACTS

- Annual truck crash fatalities are equivalent to a major airplane crash every other week of the year.
- The annual cost to society from crashes involving commercial motor vehicles is estimated to be over \$99 billion.⁸
- A January 2015 nationwide survey conducted by Harper Polling found that 76 percent of respondents oppose longer and heavier trucks.⁹ Similarly, a May 2013 public opinion poll by Lake Research Partners found that 68 percent of Americans oppose heavier trucks and 88 percent of Americans do not want to pay higher taxes for the damage caused by heavier trucks.¹⁰
- Tractor-trailers moving at 60 mph are required to stop in 310 feet – the length of a football field – once the brakes are applied.¹¹ Actual stopping distances are often much longer due to driver response time before braking and the common problem that truck brakes are often not in top working condition.
 - In 2014, violations related to tires and/or brakes accounted for 5 of the top 10 most common vehicle out-of-service (OOS) violations.¹²
- More than one in every five trucks that is inspected is placed out of service for vehicle deficiencies that prevent it from continuing to operate.¹³
- In fatal two-vehicle crashes between a large truck and a passenger motor vehicle, 96 percent of the fatalities were occupants of the passenger vehicle.¹⁴

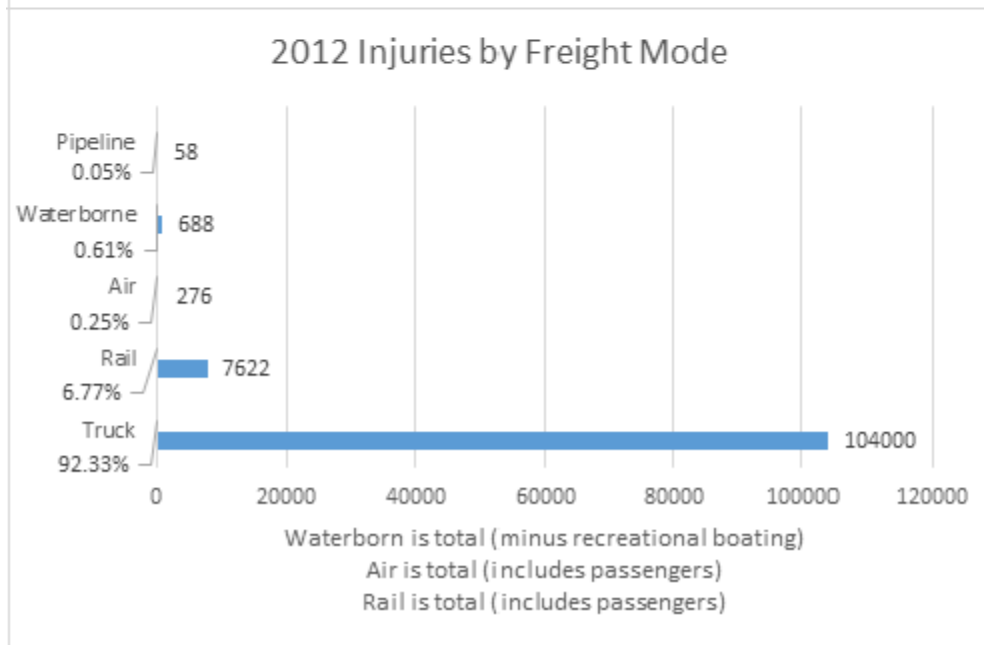
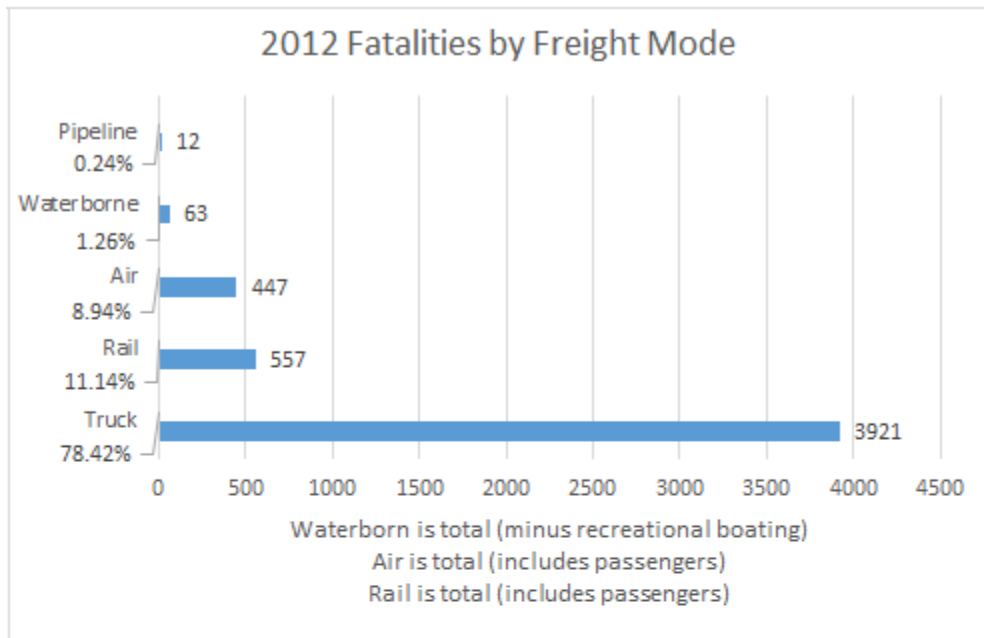
- Overweight trucks disproportionately damage our badly deteriorated roads and bridges. An 18,000 pound truck axle does over 3,000 times more damage to pavement than a typical passenger vehicle axle.¹⁵
- Thirty-two percent of America's major roads are in poor or mediocre condition and 25 percent of our bridges are structurally deficient or functionally obsolete.¹⁶ The Federal Highway Administration estimates that \$146 billion in capital investment would be needed on an annual basis over the next 20 years to significantly improve conditions and performance.¹⁷
- Increasing the weight of a heavy truck by only 10 percent increases bridge damage by 33 percent.¹⁸ The FHWA estimated that the investment backlog for bridges, to address all cost-beneficial bridge needs, is \$106.4 billion. The U.S. would need to increase annual funding for bridges by 18 percent over current spending levels to eliminate the bridge backlog by 2030.¹⁹
- The U.S. taxpayer unfairly subsidizes bigger, heavier trucks:
 - According to the FHWA, a truck weighing over 80,000 pounds only pays between 40 and 50 percent of its cost responsibility.²⁰
 - The 2007 Transportation for Tomorrow report, mandated by Congress, confirmed that heavy trucks were underpaying their fair share for highway use, that user fee fairness could be achieved through weight-distance taxes, that heavy trucks should pay an infrastructure damage fee, and that the Heavy Vehicle Use Tax—which only contributes \$1 billion annually to the Highway Trust Fund—had not been changed since the early 1980s.²¹
- The nation's deteriorating surface transportation infrastructure has severe effects on America's economy. The American Society of Civil Engineers found the cost to the economy from the state of the surface transportation infrastructure will be approximately 877,000 jobs lost and suppressed GDP growth of \$897 billion by the year 2020. Further, the impact on each American family's budget would be \$3,100 per year, based on lower earnings and higher spending.²²
- Research and experience show that allowing bigger, heavier trucks will not result in fewer trucks:
 - Since 1982, when Congress last increased the gross vehicle weight limit, truck registrations have increased 91 percent.²³
 - Increases in truck size and weights over more than 35 years have never resulted in fewer heavier trucks on the roads.²⁴
- Heavy trucks account for 17 percent of our nation's transportation energy use.²⁵
- Trucks with heavier gross weights require larger engines that decrease fuel economy on a miles-per-gallon basis.²⁶

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- ¹ Quick Facts 2013, NHTSA, DOT HS 812 100, Dec. 2014. (Quick Facts 2013)
- ² Traffic Safety Facts 2012: A Compilation of Motor Vehicle Crash Data from the Fatality Analysis Reporting System and the General Estimates System, NHTSA, DOT HS 812,032 (2012 Annual Report); and Quick Facts 2013.
- ³ *Id.*
- ⁴ Quick Facts 2013.
- ⁵ *Id.*
- ⁶ 2012 Annual Report and Quick Facts 2013.
- ⁷ *Id.*
- ⁸ 2014 Pocket Guide to large Truck and Bus Statistics: Update October 2014, FMCSA.
- ⁹ Press Release: While Large Trucking Companies Lobby for Bigger Semitrailers, National Troopers Coalition Chair Points to Poll Showing Three of Four Americans Oppose Increases, Coalition Against Bigger Trucks, February 10, 2015.
- ¹⁰ Memo Re: Increasing the legal weight for trucks in the U.S., Lake Research Partners, May 7, 2013, available at <http://trucksafety.org/wp-content/uploads/2013/05/sts2013-lr-memo-tsc.pdf>.
- ¹¹ Code of Federal Regulations (CFR) Title 49 Part 571 Section 121: Standard No. 121 Air brake systems (FMVSS 121).
- ¹² Roadside Inspections, Vehicle Violations: All Trucks Roadside Inspections, Vehicle Violations (2014 – Calendar), FMCSA, available at <http://ai.fmcsa.dot.gov/SafetyProgram/spViolation.aspx?rpt=RDVV>.
- ¹³ Motor Carrier Safety Progress Report (as of 9/30/14), FMCSA.
- ¹⁴ 2012 Annual Report.
- ¹⁵ Equivalent Single Axle Load, Pavement Interactive, Aug. 15, 2007, available at <http://www.pavementinteractive.org/article/equivalent-single-axle-load/>.
- ¹⁶ 2013 Report Card for America’s Infrastructure, American Society of Civil Engineers (ASCE), available at <http://www.infrastructurereportcard.org/>.
- ¹⁷ 2013 Status of the Nation’s Highways, Bridges, and Transit: Conditions and Performance, Chapter 8, FHWA 2014, available at <http://www.fhwa.dot.gov/policy/2013cpr/pdfs/cp2013.pdf>.
- ¹⁸ Effect of Truck Weight on Bridge network Costs, NCHRP Report 495, National Cooperative Highway Research Program, 2003, available at http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_495.pdf.
- ¹⁹ 2013 Status of the Nation’s Highways, Bridges, and Transit: Conditions and Performance, Chapter 7, p. 7-30, FHWA 2014, available at <http://www.fhwa.dot.gov/policy/2013cpr/pdfs/cp2013.pdf>.
- ²⁰ 2000 Federal Highway User Fee Equity Ratios, Addendum to the 1997 Federal Highway Cost Allocation Study Final Report, FHWA, May 2000, available at <http://www.fhwa.dot.gov/policy/hcas/addendum.htm>.
- ²¹ Report of the National Surface Transportation Policy and Revenue Study Commission, Transportation for Tomorrow, Dec. 2007, available at http://transportationfortomorrow.com/final_report/pdf/final_report.pdf.
- ²² American Society of Civil Engineers, “Failure to Act: The Economic Impact of Current Investment Trends in Surface Transportation Infrastructure,” January 2013, available at http://www.asce.org/uploadedFiles/Infrastructure/Failure_to_Act/Failure_to_Act_Report.pdf
- ²³ 2012 Annual Report.
- ²⁴ Advocates for Highway and Auto Safety, analysis of for-hire truck registrations in the Truck Inventory and Use Survey / Vehicle Inventory and Use Survey, FHWA data, and Maine-Vermont Pilot Program data.
- ²⁵ Transportation Energy Data Book: Edition 33, U.S. Department of Energy, Jul. 2014, available at http://cta.ornl.gov/data/tedb33/Edition33_Full_Doc.pdf.
- ²⁶ Western Uniformity Scenario Analysis: A Regional Truck Size and Weight Scenario Requested by the Western Governor’s Association, Apr. 2004, available at <http://www.fhwa.dot.gov/policy/otps/truck/wusr/wusr.pdf>.



Moving Freight by Truck is More Dangerous and More Deadly:

Trucks Account for 3 of 4 Freight Transportation-related Deaths and 9 of 10 Injuries





Sources for 2012 information include:

Pipeline Fatalities:

http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/publications/national_transportation_statistics/html/table_02_01.html_mfd

Waterborne Fatalities:

http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/publications/national_transportation_statistics/html/table_02_01.html_mfd

Air Fatalities:

http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/publications/national_transportation_statistics/html/table_02_01.html_mfd

Rail Fatalities:

http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/publications/national_transportation_statistics/html/table_02_01.html_mfd

Truck Fatalities: <http://www-nrd.nhtsa.dot.gov/Pubs/811868.pdf>

Pipeline Injuries:

http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/publications/national_transportation_statistics/html/table_02_02.html

Waterborne Injuries:

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Rail Injuries:

http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/publications/national_transportation_statistics/html/table_02_02.html

Truck Injuries: <http://www-nrd.nhtsa.dot.gov/Pubs/811868.pdf>