May 20, 2026

The Honorable Sam Graves, Chair
The Honorable Rick Larsen, Ranking Member
Committee on Transportation and Infrastructure
United States House of Representatives
Washington, D.C. 20515

Dear Chair Graves and Ranking Member Larsen:

As the Committee on Transportation and Infrastructure commences consideration of the BUILD America 250 Act – Building Unrivaled Infrastructure and Long-term Development for America's 250th Act, the undersigned urge you to advance known solutions to reduce the death and injury toll on our Nation's roads.

Truck Crashes Are Disturbingly High, as are Associated Costs

In 2023, 5,472 people were killed and over 153,000 people were injured in crashes involving large trucks.[1] Since 2009, the number of fatalities in large truck crashes has increased by 62 percent.[2] In that same timespan, the number of people injured in crashes involving large trucks rose by 107 percent.[3] In fatal two-vehicle crashes between a large truck and a passenger motor vehicle, 97 percent of the fatalities were occupants of the passenger vehicle.[4] Truck driving is identified as one of the most dangerous occupations in the U.S. by the Bureau of Labor Statistics.[5] In 2023, 961 occupants of large trucks were killed in crashes.[6]

According to the Federal Highway Administration (FHWA), traffic incidents, which include crashes, are one of the seven main causes of traffic congestion which erodes the reliability of travel time.[7] The report notes that for truck operators, "[t]he cost of unexpected delay can add another 20 percent to 250 percent" to their hourly costs.[8] The cost to society from crashes involving large trucks and buses was estimated to be $152 billion in 2022, the latest year for which data is available.[9] When adjusted solely for inflation, this figure amounts to nearly $176 billion.[10]

ADS-Equipped Commercial Motor Vehicles (CMVs) Must be Subject to Federal Regulations to Ensure Public Safety

Autonomous driving technology has made advances yet remains unable to consistently operate safely with all road users, conditions and scenarios, as evidenced by fatal and serious crashes involving passenger motor vehicles equipped with automated driving systems (ADS) of varying levels.[11] Transparency and robustness in crash and incident data reporting involving vehicles equipped with ADS are critical to the safety of public roads, the management of cities in which they are operating, and for researchers and related industries as well as the U.S. Department of Transportation (DOT) as it considers

regulatory proposals. Further, if those incidents had involved autonomous commercial motor vehicles (ACMVs), which are significantly larger and heavier with more stopping distance needed, the results could have been catastrophic, and the death and injury toll could have been much worse. Some of the most pressing safety shortcomings associated with autonomous vehicle (AV) technology, which include the ADS properly detecting and reacting to all other road users, driver engagement and cybersecurity, are exponentially amplified by the greater crash force of an ACMV. As such, it is imperative that ACMVs be subject to comprehensive safety regulations, including having a driver with a commercial driver license (CDL) and any relevant current or new accreditations behind the wheel for the foreseeable future.

The interest in expanding the use of this technology must not be used as a pretext to eviscerate essential safety regulations administered by the Federal Motor Carrier Safety Administration (FMCSA), and particularly in the absence of new standards to ensure the technology performs safely and as needed. The public safety protections provided by the Federal Motor Carrier Safety Regulations (FMCSRs) have become no less important or applicable simply because a CMV has been equipped with an ADS. In fact, there are additional substantial public safety concerns presented by ACMVs.

Advocates for Highway and Auto Safety (Advocates) and numerous stakeholders developed the "AV Tenets," policy positions which should be foundational to any AV legislation.[12] The AV Tenets have four main, commonsense categories including: 1) prioritizing safety of all road users; 2) guaranteeing accessibility and equity; 3) preserving consumer and worker rights; and, 4) ensuring local control and sustainable transportation. While the AV Tenets were developed for application to vehicles under 10,000 pounds, many of the principles also could apply to larger commercial vehicles. At a minimum, ACMVs must meet safety standards for the ADS and related systems, including for cybersecurity, and operations must be subject to adequate oversight as a starting point for their potential deployment.

Requiring ACMV manufacturers submit a "safety case" and assigning significant operational and safety issues to a future rulemaking committee falls far short of ensuring sensible guardrails are in place for the safe deployment of ACMVs.

Federal CMV Weight and Size Limits Should Not Be Weakened

The design, maintenance and state of repair of our roadway and bridge network have a direct impact on user safety. The American Society of Civil Engineers (ASCE) reports "these vital lifelines are frequently underfunded, and over 40% of the system is now in poor or mediocre condition."[13] In their 2025 Report Card, roads received a grade of "D+," with 39 percent in poor or mediocre condition.[14] Bridges received a "C," with about a third of the nation's bridge inventory (221,791 spans) in need of repair replacement. In addition, approximately 45 percent of bridges have exceeded their planned design lives of 50

years.[15] Moreover, driving on deteriorated and congested roads costs the average driver over $1,400 per year in vehicle operating costs and lost time.[16]

Current maximum weights and lengths for CMVs aim to protect truck drivers, the traveling public, and our Nation's roads, bridges and other infrastructure components. Raising truck weight or size limits could result in an increased prevalence and severity of crashes. Longer trucks come with operational difficulties such as requiring more time to pass, having larger blind zones, crossing into adjacent lanes, swinging into opposing lanes on curves and turns, and taking a longer distance to adequately brake. In fact, double trailer trucks have an 11 percent higher fatal crash rate than single trailer trucks.[17] Overweight trucks also pose serious safety risk. Increasing the weight of a heavy truck by only 10 percent increases bridge damage by 33 percent.[18] Brake violations are a major reason for out-of-service violations.[19] According to a North Carolina study by IIHS, trucks with out-of-service violations are 362 percent more likely to be involved in a crash.[20] This is also troubling considering that tractor-trailers moving at 60 miles per hour are required to stop in 310 feet – the length of a football field – once the brakes are applied.[21] 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 adequate working condition.

Despite claims to the contrary, bigger trucks will not result in fewer trucks. Following every past increase to federal truck size and weight limits, the number of trucks on our roads has gone up. Since 1982, when Congress last increased the gross vehicle weight limit, truck registrations have more than doubled.[22] The U.S. DOT study also addressed this meritless assertion and found that any potential mileage efficiencies from the use of heavier trucks would be offset in just one year.[23]

There is overwhelming opposition to any increases to truck size and weight limits. The public, local government officials, safety, consumer and public health groups, law enforcement, first responders, truck drivers and labor representatives, families of truck crash victims and survivors, and even Congress on a bipartisan level have all rejected attempts to increase truck size and weight limits. A poll commissioned by Advocates earlier this year found 83 percent of respondents are concerned about sharing the road with large and heavy tractor-trailer trucks.[24] Also, the technical reports released in June 2015 from the U.S. DOT Comprehensive Truck Size and Weight Study concluded there is a "profound" lack of data from which to quantify the safety impact of larger or heavier trucks and consequently recommended that no changes in the relevant truck size and weight laws and regulations be considered until data limitations are overcome.[25] Unfortunately, this legislation will not ensure better roadways will be built in the future as it eviscerates federal truck size and weight limits which protect the traveling public and our infrastructure.

Teen Truck Drivers Jeopardize Public Safety

Research has demonstrated that younger CMV drivers have high crash rates. The Insurance Institute for Highway Safety (IIHS), citing numerous studies, has stated that "age is a strong risk factor for truck crash involvement."[26] In fact, age is the most important factor in the high rate of involvement of younger CMV drivers in fatal crashes. The general pattern of over-involvement in fatal crashes for younger CMV drivers dominates all other factors.[27] Studies of young CMV drivers show that as the age of the driver decreases, large truck fatal crash involvement rates increase.[28] CMV drivers under the age of 19 are four times more likely to be involved in fatal crashes, and CMV drivers between the ages of 19-20 are six times more likely to be involved in fatal crashes than all truck drivers.[29] Moreover, CMV drivers aged 19-20 are about five times more likely to be involved in police reported and fatality crashes compared to all other truck drivers age 21 and older.[30]

For nearly nine decades, since 1937, in order to obtain a CDL to drive a CMV in interstate commerce, an applicant has been required to be at least 21 years of age.[31] Supporters of allowing drivers under the age of 21 to operate in interstate commerce claim that such a drastic departure from well settled federal law will alleviate the so-called "driver shortage." However, the U.S. Bureau of Labor Statistics (BLS) study found that "the labor market for truck drivers works about as well as the labor markets for other blue-collar occupations" and "a deeper look [at the truck industry labor market] does not find evidence of a secular shortage."[32]

Participation in the Safe Driver Apprenticeship Pilot Program (SDAP) has been abysmal. According to FMCSA the agency has received only 80 applications for apprentice drivers as of June 30, 2025.[33] In addition, of those 80 applications, nearly half (30) did not complete the probationary period. The carrier participation rates in SDAP are equally poor.[34] The agency has received 211 motor carrier applications for participation in the pilot program.[35] Of this total, 62 carriers are currently approved to participate in the program, 88 carriers have been disapproved due to not meeting the prerequisite safety standards, 55 carriers have voluntarily withdrawn from the program, and 6 carriers have been removed from the program because they no longer have proper operating authority.[36] This legislation further perpetuates the misguided notion that teen truck drivers will help the industry meet its growing challenges without needlessly threatening public safety.

Driver Fatigue is a Serious Safety Issue in the Trucking Industry

Self-reports of fatigue, which almost always underestimate the problem, find that fatigue in truck operations is a significant issue. In a 2006 driver survey prepared for the Federal Motor Carrier Safety Administration (FMCSA), "65 percent [of drivers] reported that they often or sometimes felt drowsy while driving" and almost half (47.6 percent) of drivers said they had fallen asleep while driving in the previous year.[37] In fact, the National Transportation Safety Board (NTSB) has repeatedly cited fatigue as a major contributor to truck crashes as determined by its investigations.[38] By weakening the hours-of-service

rules for certain drivers and drivers undermining use of electronic logging devices (ELDs), this legislation puts truck drivers, their loads and everyone on the roads with them at risk.

Rulemaking Committees Are Not an Acceptable Replacement for Agency Rulemakings

The mission of the U.S. DOT is to "Advance safety. Move people and goods. Build big and beautiful infrastructure."[39] This legislation undermines these laudable and attainable goals by sidestepping numerous important safety issues and instead assigning them to rulemaking committees that can be dominated by special interests, either overtly or surreptitiously, and fail to produce solutions that place safety as a priority.

Some Modest Improvements Are Included but Will Not Adequately Address the Serious and Significant Death and Injury Toll on our Nation's Roadways

The BUILD America 250 Act does include modest advances that will help to improve public safety. These include provisions to address marijuana and polysubstance impairment, continued funding for the Safe Streets and Roads for All Program, studying the effectiveness of grant programs and an interagency working group to address roadway workers. The proposed legislation also includes several provisions that will enhance CMV safety such as a directed rulemaking to improve the design of motorcoaches, grant funding for trainers to provide behind-the-wheel training to CDL candidates and a review of the New Entrant Safety Assurance Program.

Thank you for your consideration of these issues as you develop policy for our Nation's infrastructure for the next half decade. We are more than glad to be of assistance to the Committee in any way in furtherance of reducing the death and injury toll on our roadways.

Sincerely,

Advocates for Highway and Auto Safety
BioInjury
Center for Auto Safety
Citizens for Reliable and Safe Highways
Consumer Federation of America
Consumers for Auto Reliability and Safety
Kids and Car Safety
National Coalition for Safer Roads
Parents Against Tired Truckers
Society for Advancement of Violence and Injury Research
Stopdistractions.org
Trauma Foundation
Truck Safety Coalition

cc: Members of the House Transportation and Infrastructure Committee

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[1] Traffic Safety Facts 2023: A Compilation of Motor Vehicle Traffic Crash Data, NHTSA, DOT HS 813 738, Aug. 2025, (Annual Report 2023).

[2] Annual Report 2023 Note, the 62 percent figure represents the overall change in the number of fatalities in large truck involved crashes from 2009 to 2023. However, between 2015 and 2016 there was a change in data collection at U.S. DOT that could affect this calculation. From 2009 to 2015 the number of fatalities in truck-involved crashes increased by 21 percent, and between 2016 to 2023, it increased by 17 percent, and between 2015 and 2016, it increased by 14 percent.

[3] Annual Report 2023 Note, the 107 percent figure represents the overall change in the number of people injured in large truck involved crashes from 2009 to 2023. However, between 2015 and 2016 there was a change in data collection at U.S. DOT that could affect this calculation. From 2009 to 2015 the number of people injured in truck-involved crashes increased by 59 percent, and between 2016 to 2023, it increased by 14 percent, and between 2015 and 2016, it increased by 14 percent.

[4] Insurance Institute for Highway Safety (IIHS), Large Trucks. https://www.iihs.org/topics/fatality-statistics/detail/large-trucks.

[5] National Census of Fatal Occupational Injuries in 2023, Bureau of Labor Statistics, Dec. 2024, USDL-24-2564, available at: https://www.bls.gov/news.release/pdf/cfoi.pdf.

[6] Annual Report 2023.

[7] Traffic Congestion and Reliability: Trends and Advanced Strategies for Congestion Mitigation, March 2020, FHWA. Available here: https://ops.fhwa.dot.gov/congestion_report/chapter2.htm (2020 Traffic Congestion and Reliability Report.)

[8] 2020 Traffic Congestion and Reliability Report.

[9] 2024 Pocket Guide to Large Truck and Bus Statistics, FMCSA, Jul. 2025, RRA-24-002.

[10] CPI Inflation Calculator, BLS, available at https://www.bls.gov/data/inflation_calculator.htm, calculated from Jan. 2022 – Jan. 2026.

[11] NHTSA, Standing General Order 2021-01 (Aug. 2021). ADS Incident Report Data available here: https://static.nhtsa.gov/odi/ffdd/sgo-2021-01/SGO-2021-01_Incident_Reports_ADS.csv

[12] https://saferoads.org/autonomous-vehicle-tenets/.

[13] https://infrastructurereportcard.org/wp-content/uploads/2025/03/Full-Report-2025-Natl-IRC-WEB.pdf

[14] *Id*.

[15] *Id*.

[16] *Id*.

[17] 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.

[18] Effect of Truck Weight on Bridge network Costs, NCHRP Report 495, National Cooperative Highway Research Program, 2003.

[19] Roadside Inspections, Vehicle Violations: All Trucks Roadside Inspections, Vehicle Violations (2019 – Calendar), FMCSA.

[20] Teoh E, Carter D, Smith S and McCartt A, Crash risk factors for interstate large trucks in North Carolina, Journal of Safety Research (2017).

[21] Code of Federal Regulations (CFR) Title 49 Part 571 Section 121: Standard No. 121 Air brake systems (FMVSS 121).

[22] 2017 Annual Report.

[23] Comprehensive Truck Size and Weight Limits Study, Federal Highway Administration (June 2015).

[24] See: https://saferoads.org/2026-av-tech-truck-poll/

[25] Comprehensive Truck Size and Weight Limits Study, Federal Highway Administration (June 2015).

[26] Insurance Institute for Highway Safety, Comments to the docket, FMCSA-2000-8410-0515; citing Christie, R. and Fabre, J. 1999. Potential for fast-tracking heavy vehicle drivers. Melbourne, Australia: National Road Transport Commission; Blower, D. 1996. The accident experience of younger truck drivers. Ann Arbor, MI: University of Michigan Transportation Research Institute; Frith, W.J. 1994. A case-control

study of heavy vehicle drivers' working time and safety. *Proceedings of the 17th Australian Road Research Board Conference*, 17-30. Queensland, Australia: Australian Road Research Board; Stein, H.S. and Jones, I.S. (1988).

[27] Campbell, K. L., *Fatal Accident Involvement Rates By Driver Age For Large Trucks*, Accid. Anal. & Prev. Vol 23, No. 4, pp. 287-295 (1991).

[28] *Id*.

[29] *Id*; Data on CMV drivers under the age of 21 is likely restricted to intra-state operations.

[30] Blower, D.; Lyles, R.W.; Campbell, K.L.; and Stamatiadis, P. 1990. The Michigan heavy truck study. Lansing, MI: Michigan Office of Highway Safety Planning (1990).

[31] 2 FR 113 (Jan. 22, 1937); 49 CFR § 391.11.

[32] United States Department of Labor, Bureau of Labor Statistics, Is the U.S. labor market for truck drivers broken? (Mar. 2019).

[33] Safe Driver Apprenticeship Pilot (SDAP) Program Quarterly Updates, 2025 Second Quarter, available at: https://www.fmcsa.dot.gov/registration/commercial-drivers-license/sdap/safe-driver-apprenticeship-pilot-sdap-program

[34] *Id*.

[35] *Id*.

[36] *Id*.

[37] Hours of Service of Drivers, NPRM (2010 NPRM), FMCSA, 75 FR 82170 (Dec. 29, 2010), citing Dinges, D.F. & Maislin, G., "Truck Driver Fatigue Management Survey," FMCSA (May 2006), FMCSA-2004-19608-3968.

[38] NTSB, Highway, Multivehicle Work Zone Crash on Interstate 95 Cranbury, New Jersey June 7, 2014, Accident Report NTSB/HAR-15/02 (Aug. 11, 2015) and Fatigue, Disregard for Safety Regulations and Oversight Failures Lead to Fatal Bus and Truck Collision in Upstate New York, Report HIR-24-08, December 19, 2024.

[39] See: https://www.transportation.gov/mission/about-dot.