May XX, 2017

The Honorable
Chairman Rodney Frelinghuysen
House Committee on Appropriations
H-305 The Capitol
Washington, DC 20515

The Honorable
Ranking Member Nita Lowey
House Committee on Appropriations
H-305 The Capitol
Washington, DC 20515

The Honorable
Chairman Mario Diaz-Balart
House Appropriations Subcommittee
on Transportation, Housing,
and Urban Development
2358-A Rayburn HOB
Washington, DC 20515

The Honorable
Ranking Member David Price
House Appropriations Subcommittee
on Transportation, Housing,
and Urban Development
2358-A Rayburn HOB
Washington, DC 20515

Re: Gross Vehicle Weight limit pilot safety study in FY 2018 appropriations

Dear Chairman Frelinghuysen and Members of the Committee,

As leaders in manufacturing, agribusiness, and other industries that sustain millions of American jobs, we support inclusion in FY 2018 appropriations legislation of a limited pilot project to advance safety and infrastructure protection. The current Gross Vehicle Weight (GVW) limit for Federal Interstate Highways of 80,000 lbs on 5 axles was established in 1982, prior to the standardization of anti-lock brakes on Class-8 tractors. While we have made significant progress in vehicle safety and pavement technology, it has been 35 years since the US updated GVW limits on Federal Interstate Highways. Yet, states seek greater flexibility when it comes to GVW limits on most roads. Currently, due to exceptions in the law, 31 US states allow trucks over 80,000 pounds on Federal Interstate Highways. under special permits, categorical exemptions, or on designated corridors. Furthermore, 18 states currently allow trucks at GVW greater than 80,000 lbs on non-Interstate highways as a matter of right, and all 50 states allow trucks to haul at GVW greater than 80,000 lbs on state roads under special permits, categorical exemptions, or on designated corridors.

While states have rightfully found ways to update GVW limits to better suit their individual needs, this often means trucks hauling more than 80,000 lbs are using less ideal infrastructure and traveling on more local roads past schools, churches, and playgrounds where pedestrians are often present. Congress should seek information to know if there is a safer, more sustainable, and more productive way to modernize the current limit of 80,000 lbs on Federal Interstate Highways and give states the flexibility they desire to move those loads on the safer Interstate and away from roads with pedestrians.

Government research has identified a lack of adequate data regarding the safety implications, or benefits, of modernizing GVW limits. The *2016 US Department of Transportation, Comprehensive Truck Size and Weight Limit Study (CTSWLS), Report to Congress* concluded that Congressional changes in GVW limits were a matter of policy and that more data and

evidence would enable DOT to provide Congress with better guidance. The report specifically referenced the lack of information on the number of vehicle axles and actual loaded weight at the time of a crash. The report also noted that "the difficulty in studying actual truck weight in crash-based analyses was (previously) noted in a Transportation Research Board study" in 2002.

At the same time, the *2016 CTSWLS* included information indicating that a 91,000 lb, 6-axle GVW limit for Federal Interstate Highways could help address several of our nation's long term infrastructure challenges, including but not limited to: safety, infrastructure maintenance costs, greenhouse gas emissions, congestion, competitiveness and productivity. Specifically, the report found that the 91,000 lb, 6-axle configuration, when implemented on Federal Interstate Highways in all 50 states, would result in a:

- one foot reduction in stopping distance during braking tests when compared to the current 80,000 lb, 5-axle configuration
- 2.4 – 4.2% reduction in life-cycle pavement costs for Federal Interstate and NHS Highways
- .4% reduction in annual program enforcement costs
- 1.2 billion mile reduction in annual Vehicle Miles Traveled on US roads
- $358 million reduction in annual congestion costs
- 109 million gallon reduction in annual fuel consumption
- 2.4 billion pound reduction in annual carbon dioxide emissions
- $5.6 billion reduction in annual logistics costs for American businesses

Given the potential benefits of modernizing the baseline GVW limit on Federal Interstate Highways to a 91,000 lb, 6-axle, bridge formula compliant configuration, we believe that Congress should create an opportunity for policy makers and DOT to get the information they need to determine if there is a correlation between GVW and serious accidents.

We respectfully encourage the committee to include language in the FY 2018 Transportation, Housing, and Urban Development appropriations bill to create a voluntary program under which 10 states could opt-in to allowing 91,000 lb, 6-axle, bridge formula compliant trucks on Federal Interstate Highways within their borders, and collect additional safety data regarding the GVW and axle configurations of Class-8 and Class-9 commercial vehicles involved in accidents resulting in serious injury or death. To enable carriers to recoup the investment of an additional axle, this pilot should be for 15 years, which is the average life span of a commercial trailer. Such a pilot, similar to others that have been included in previous appropriations bills, will provide critical information that is currently lacking, but necessary to determine if significant benefits affiliated with this configuration can be realized in a way that preserves or enhances the safety our nation's roads.

We thank you for your thoughtful consideration of this request and your attention to this important issue.

Sincerely,