

May 26, 2017

The Honorable
Chairman Rodney Frelinghuysen
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 Nita Lowey
House Committee on Appropriations
H-305 The Capitol
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 significant progress has been made in vehicle safety and pavement technology, it has been 35 years since the US updated GVW limits on Federal Interstate Highways. Yet, states are seeking greater flexibility for 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 updated GVW limits to better suit their individual needs, this often means trucks hauling more than 80,000 lbs are using less ideal infrastructure thus traveling on more local roads past schools, churches, and playgrounds where pedestrians are often present. Congress should seek information to know if there are more safe, more sustainable, and more productive ways to modernize the current limit of 80,000 lbs on Federal Interstate Highways and give the states flexibility to move those loads on the safer Interstates and away from roads with pedestrians.

The government research has identified a lack of adequate data and research regarding 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 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 cited a study from 2002 that said, “the difficulty in studying actual truck weight in crash-based analyses was (previously) noted in a Transportation Research Board study.”

However, 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:

- 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
- 0.4% 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 Congress should create an opportunity for policy makers and DOT to obtain 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 commercial trucks involved in serious accidents. 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 included in previous appropriations bills, will provide critical information currently lacking but necessary to determine if significant benefits affiliated with this configuration can be realized in a way to preserve or enhance the safety our nation’s roads.

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

Sincerely,

Agriculture & Commodities Transportation Association
Alabama Cattlemen's Association
Alabama Poultry and Egg Association
American Beverage Association
American Chemistry Council
American Forest and Paper Association
American Frozen Food Institute
American Malting Barley Association
American Soybean Association
Anheuser-Busch Companies
Arizona Cattle Feeders Association
Arizona Cattle Growers Association
Arkansas Cattlemen's Association
Beer Institute
Border Valley Trading
Campbell Soup
Cargill
Colorado Cattlemen's Association
Colorado Livestock Association
Dairy Farmers of America
Delmarva Poultry Industry, Inc.
Florida Cattlemen's Association
Georgia Cattlemen's Association
Georgia Poultry Federation
Glass Packaging Institute
Graphic Packaging
Grocery Manufacturers of America
International Paper
Iowa Cattlemen's Association
Kansas Livestock Association
Kentucky Poultry Federation
Land O'Lakes
Leprino Foods
Michigan Cattlemen's Association
MillerCoors
Minnesota State Cattlemen's Association
Mississippi Cattlemen's Association
Missouri Cattlemen's Association
National Association of Chemical Distributors
National Barley Growers Association
National Beef Packing Company, LLC
National Carriers, Inc.
National Cattlemen's Beef Association
National Grain and Feed Association
National Milk Producers Federation

National Pork Producers Council
National Turkey Federation
Nebraska Cattlemen's Association
North American Meat Institute
North Carolina Poultry Federation
North Dakota Stockmen's Association
Ohio Cattlemen's Association
Oklahoma Cattlemen's Association
Oldcastle Materials
Oregon Cattlemen's Association
Owens-Illinois
Pacific Northwest Asia Shippers Association
Pennsylvania Cattlemen's Association
PepsiCo, Inc.
Smithfield Foods
Solvay
South Carolina Cattlemen's Association
South Dakota Cattlemen's Association
Soybean Transportation Board
Texas and Southwestern Cattle Raisers Association
Texas Cattle Feeders Association
Texas Poultry Federation
The Coca-Cola Company
The Fertilizer Institute
The Poultry Federation (AR, MO, OK)
Tyson Foods, Inc.
U.S. Forage Export Council
U.S. Premium Beef, LLC
United Aluminum Corporation
United Fresh Produce Association
US Poultry and Egg Association
Utah Cattlemen's Association
Virginia Cattlemen's Association
Virginia Poultry Federation
Washington Cattle Feeders Association
Washington State Potato Commission
WestRock
Wisconsin Cattlemen's Association
Wyoming Stock Growers Association