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EPA Docket Center
WJC West Building, Room 3334
1301 Constitution Avenue NW
Washington, DC 20004

RE: Comments on EPA "Control of Air Pollution From New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards, Proposed Rule," Docket EPA-HQ-OAR-2019-0055

To Whom It May Concern:

As EPA develops the final rule on tailpipe emissions from heavy-duty trucks as part of the "Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards," these comments are being filed in support of a single national low-NOx rule that is technologically feasible, protects American jobs, and is not disruptive to the nation's economy or supply chains.

An approach such as Option 1 that cannot be achieved by all classes of trucks under widely-varied business models will cause significant uncertainty amongst fleets and will result in purchasing new trucks before new standards are implemented. This pre-buy/low-buy/no-buy scenario would jeopardize thousands of good-paying jobs and slow environmental success. To be effective, the final rule must result in new trucks that are:

Affordable - If trucking companies choose not to purchase new trucks due to cost or reliability concerns, older trucks will stay on the road longer and environment goals will not be achieved;

Durable - New, more expensive trucks are not purchased to sit in repair bays. Trucks are unproductive pieces of equipment unless they are moving freight;

Safe - Safety is a top priority in every trucking operation. Putting off the purchase of the newest equipment will delay the use of the latest safety technologies; and

Cleaner - An unworkable rule will delay fleet turnover and impede environmental progress.

Fleets don't make trucks -- they are consumers that buy trucks. While this rule is directed at manufacturers, it is trucking companies buying new technologies that determine the success or failure in the implementation of every trucking emission regulation. Fleets remain extremely sensitive to the many difficulties involved in running a trucking company – a matter that is especially significant to the 97 percent of fleets classified as small businesses.

Thank you for considering these comments on behalf of the members of the Alabama Trucking Association and the trucking industry in Alabama which is home to more than 110,000 working Alabamians and 30,000 trucking companies. It is our collective goal to continue working to improve the environment and keep the nation's goods and economy moving ahead.

Respectfully Submitted,



Mark Colson

President and CEO

Alabama Trucking Association