

Cleaner Safer Trucking

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Cleaner Safer Trucking is a group of motor carriers and others that has come together to ask Congress to lift the so-called “freeze” on what are called longer combination vehicles or LCVs.

As many of you are probably aware in 1991 Congress passed a provision, as a part of the Intermodal Surface Transportation Efficiency Act that stripped the states of their authority to regulate which truck configurations can safely operate on their highways. There was no crisis or great public outcry. Rather, folks in Washington decided they were wiser and better suited to make such decisions.

As a result since 1991, states have been prohibited from expanding the list of highways that can be open to these higher-cube capacity trucks.

For the purposes of this discussion we’re talking about a truck tractor and two or more trailers with a gross weight over 80,000 pounds and where the overall length of at least one trailer is over 28 feet.

There is nothing new about these vehicles: Some form of LCVs is currently used in 13 western states and on turnpikes in NY, Ohio, Indiana and Florida. They’ve been in use on the New York Thruway since 1959.

CST has one overriding message:

The United States has an urgent need to modernize our truck fleets to make them more productive and energy efficient in delivering goods. The time has come to lift the freeze to permit states, at their discretion, to allow for the expanded operation of these cleaner and more productive trucks on appropriate routes under state permit.

Let’s talk a little bit about how the world has changed since 1991. If we lived in 1991 there’d be no CD players, no HD TV, no Internet browser, no broadband, no Google, no Starbucks. And yet we treat truck productivity the same way we did then.

But comparing today’s trucks to trucks on the road in 1991 is a little like comparing a 2011 Audi A6 to a Ford Pinto or perhaps an American Motors Gremlin if any of you are old enough to remember that. Everything from fuel economy to driver screening to safety technology has been vastly improved.

And these changes have been especially dramatic when it comes to safety. Since 2000, the fatal crash rate for large trucks has fallen a whopping 54.5%. The number of truck-involved injuries has declined by 39 percent. These are record low numbers. Among the safest performing vehicles are LCVs.

The world will change even more over the next 10 years.

Over just the next 10 years, freight in all modes is estimated to increase 25-30% raising serious capacity and environmental questions. How will we manage this?

So our challenge is pretty clear: How do we deliver more freight, more efficiently in support of current & future demands?

Which gets us back to the freeze. In 1991 Congress froze trucking productivity in time and place. To this day you can use LCVs only on those roads, and in the exact configurations on those roads that they were used on June 1, 1991.

This has the following highly unfortunate consequences:

- **Undermines our ability to be more efficient in moving freight, which undercuts U.S. manufacturers in world markets.** The fact is the United States has fallen far behind our trading partners when it comes to clean and efficient freight transportation. Notably, Canada, Mexico and the European Union have all embraced up-to-date truck configurations. How are we going to compete with a less progressive freight system?
- **Prevents the transportation industry from moving the same amount of freight with fewer trucks which would reduce congestion, fuel consumption and engine emissions.** For example, a triple trailer configuration burns 29% less fuel than conventional double 28' trailers on a ton-mile per gallon basis.

It also ignores the exemplary safety record established on the roads where such equipment has operated successfully for many years

Let's talk about safety because that's the issue most often used by opponents to unfairly and inaccurately characterize this issue.

FACT: LCVs are currently used safely and successfully around the globe including parts of the United States and in Canada, Australia, the European Union and Mexico.

FACT: LCV's have a better safety record than conventional trucks. As just one example, a recent Canadian federal government study showed LCVs in that country have 60% fewer crashes than single trailer vehicles. , LCVs operated by coalition members in 2010 had an accident frequency rate of 0.268 per million miles traveled which is one half the the frequency rate of 0.608 accidents per million miles driven for all other truck configurations.

FACT: The use of more productive trucks reduces the rate of increase in truck traffic because you need fewer trucks to move a given amount of freight. Truck traffic is estimated to grow 30% in the next ten years. Do we really want 30% more trucks on the road and how do we pay for the infrastructure to support that? A study by U.S. DOT estimated that total truck traffic would decrease by 25 percent in just 13 western states with more efficient utilization of LCVs.

FACT: Lifting the freeze would allow longer configurations in several states to move off of secondary roads and onto much safer Interstate-grade highways where they are now prohibited.

Opponents love to dissect these vehicles and talk about things like stopping distances and sway. The fact is that every configuration has unique operating characteristics. However, I would suggest to you the best data are real-world, on-the-road experience and in this most important of all data sets, LCVs come out shining. Opponents will also tell you that these trucks will ruin road pavements. This ignores the fact that when you have multiple trailers, you are spreading weight over additional axles, mitigating damage. They also fail to take into account the reduced rate of increase in overall truck traffic and the corresponding benefits to road and bridge maintenance.

The benefits of LCVs are substantiated by research as well as real world experience:

The University of Michigan Transportation Research Institute found that on a per vehicle basis LCVs improve productivity 44%, reduce fuel consumption and emissions 32%, reduce infrastructure impacts 40% , reduce VMT 44% and reduce costs to shippers by 29%.

In a study requested by the Western Governors Association, the Federal Highway Administration found that a limited increase in the use of LCVs in 13 western states would:

- reduce heavy truck vehicle miles traveled by 25%
- reduce fuel consumption and emissions by 12%
- save shippers \$2 billion a year;
- reduce pavement costs by as much as 4% over 20 years, and
- reduce highway noise by 10%.

A recent study by the Ontario Ministry of Transport found the widespread use of LCVs there would:

- eliminate 750,000 truck trips per year
- remove 2,800 trucks per day from the roads around Toronto and
- reduce greenhouse gases by 151 kilotons a year

It's also important to point out that states currently allow larger vehicles under permit on off-Interstate roads and under state grandfather rights. The vast majority of large truck accidents occur on these off-Interstate undivided roads with at-grade intersections which are not designed to the more rigorous specifications of the Interstates. U.S. DOT's Comprehensive Size and Weight Study found that travel on these roads significantly increases large truck crash risks compared to travel on Interstate and other roadways with Interstate-standard design features. Relaxation of the federal freeze on LCVs would serve to move larger vehicles onto Interstate-standard highways and therefore improve safety.

In conclusion I'd like to quote from a recent report by Diane Katz of the Heritage Foundation: Discussing the limitation caused by the freeze, she says:

“These now-petrified standards have been rendered largely obsolete by advances in engineering, thus inhibiting productivity improvements for hauling freight. It's time, therefore, for Washington to get out of the way...”

[In 1991] proponents argued for standardizing the differing state rules. Railroads, too, had an interest in limiting trucking volume. Rather than harmonize the standards, however, Congress simply prohibited states from changing the routes or weight and length limits on LCVs that were in effect on June 1, 1991. And there they have remained ever since, despite major advances in transportation technology and safety...”

She goes on to say: “State regulators are in a far better position to determine feasible standards based on local conditions and to be held accountable...”

Which is why we are asking Congress to restore to the states the authority stripped from them twenty years ago to regulate truck configurations. It is our view that state legislatures are better qualified to determine which truck configurations are best suited for our highways than is Washington.

Thank you for your time.

For additional information contact:

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Sources:

TRB Special Report No. 267, Regulation of Weights, Lengths and Widths of Commercial Motor Vehicles. Transportation Research Board, 2002

Comprehensive Truck Size and Weight Study, U.S. DOT, 2000

Western Uniformity Scenario Analysis, U.S. DOT, 2004

Literature Review of the Safety of Long Combination Vehicles and their Operation in Canada, Canada Safety Council, 2003

CST coalition members and supporters

Members

- AAA Cooper Transportation
- ABF Freight System, Inc. (ABF)
- American Trucking Associations
- Con-Way Inc.
- Estes Express Lines
- Old Dominion Freight Line
- Mack Trucks, Inc. and Volvo Trucks North America
- Southeastern Freight Lines

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- Highway Users Association
- International Warehouse and Logistics Association
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