

Fact v. Fiction on Heavy Vehicle Speed Limiters

***Fiction:** Speed differentials will lead to more collisions, so it is safer to not limit trucks.*

FACT:

This assertion implies that there are no (or minimal) speed differences now on our highways. In other words, all vehicles are traveling at or very near the posted speed limit. This, of course, is not the case at all. Anyone who drives, or is a passenger, on our highways will readily observe that we currently must deal with vehicles traveling either at or slightly below the speed limit as well as those traveling well above it. So, the suggestion that keeping the biggest (and therefore potentially most dangerous) vehicles in the slow to medium range is dangerous is nonsense. After all, they are the vehicles that need the most distance to stop safely in an emergency.

The Federal Motor Carrier Safety Administration's (FMCSA) Notice of Proposed Rulemaking (NPRM) found that "recent and past research studies dating to the 1970s generally have concluded that the overall benefits of speed limiters outweigh the potential increase in crashes caused by trucks moving slower than cars."¹ The Agency elaborated this point in their Preliminary Regulatory Impact Analysis and Initial Regulatory Flexibility Analysis, stating that, "even though limiting heavy vehicles to 65 mph may increase the speed differential between these vehicles and the median travel speed on some roads, 65 mph speed limiting devices may actually reduce the risk of heavy vehicles being involved in a crash on roads with posted speed limits of up to 80 mph (i.e., 15 mph greater than 65 mph)."²

This was then confirmed in a 2012 study that "included data from 20 fleets and about 138,000 trucks, and analyzed more than 15,000 crashes, as they operated under real-world, revenue-producing deliveries. The findings showed strong positive benefits for speed limiters. Results indicated that trucks equipped without speed limiters had a significantly higher speed limiter-relevant crash rate (approximately 200%) compared to trucks with speed limiters."³

Moreover, a recent ex-post evaluation published by the European Commission in 2013 on the installation and use of speed limitation devices recommended "to keep the current obligation of speed limiters for HCVs [Heavy Commercial Vehicles] and to keep the level of the maximum speed of the speed limiters at the current levels."⁴

¹ <https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/USDOT%20Speed%20Limiting%20Devices%20NPRM.pdf>

² <https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/speed-limiter-pria-082016.pdf>

³ Jeffrey S. Hickman, Feng Guo, Richard J. Hanowski, Richard Bishop, Gene Bergoffen & Dan Murray (2012) Safety Benefits of Speed Limiters in Commercial Motor Vehicles Using Carrier-Collected Crash Data, *Journal of Intelligent Transportation Systems*, 16:4, 177-183, DOI: 10.1080/15472450.2012.704340

⁴ European Commission, 2013, Evaluation study on Speed Limitation Devices. Ex-post evaluation of Directive 92/6/EEC on the installation and use of speed limitation devices for certain categories of motor vehicles in the Community, as amended by Directive 2002/85/EC. Directorate-general for Mobility and Transport. Transport & Mobility Leuven. Belgium

Fact v. Fiction on Heavy Vehicle Speed Limiters

***Fiction:** Speeding is not a major issue for CMVS, therefore a speed limiter mandate is unnecessary*

FACT:

Data from the Department of Transportation shows that speeding-related fatalities account for nearly one out of four traffic fatalities in the United States in 2017⁵ and that “speeding of any kind” was the top driver-related factor/violation for drivers of large trucks in 2015, 2016, and 2017.⁶

Moreover, Texas A&M Transportation Institute (TTI) looked at nearly 2,800 CMV crashes in 20 counties across the state of Texas and found that “speeding” was one of the driving behaviors that “had the most impact on CMV-at fault crashes.”⁷ This in-depth and informative report also concluded that when speeding was a contributing factor, estimated crash costs were 20 percent higher than crashes where speeding was not a contributing factor,” which is not entirely surprising considering TTI also concluded that “crashes with speed citations had a 170 percent greater injury/fatality risk per crash.”⁸

Additionally, “[data from] the Insurance Institute for Highway Safety show[s] that the number of trucks traveling over the 75 mph speed limit rose from 8% to 14% during the period from 1996 to 2006.”⁹ Several years after, another IIHS study concluded that “[there is] a wealth of evidence that increasing speed limits leads to higher travel speed and an increased probability of exceeding the new speed limit. Results [from this study] moreover contradict the claim that increasing speed limits reduces speed variance.”¹⁰ Unfortunately, this problem will continue to get worse as at least eight states are considering increasing speed limits for trucks and/or eliminating differential speed limits for trucks.¹¹

According to federal data analyzed by the Truck Safety Coalition, there are 14 states that now have truck speed limits of 75 mph or more that together comprise approximately 20 percent of the population (based on 2018 estimates based on 2010 Census figures). In 1996, the year the national speed limit was repealed, these 14 states represented approximately 21 percent of fatalities resulting from a crash involving at least one large truck; in 2017, the most recent year of available data, these same states now accounted for nearly 30 percent of truck crash fatalities.¹²

⁵ <https://www.nhtsa.gov/risky-driving/speeding>

⁶ Large Truck and Bus Crash Facts 2017 Early Release; People Table 29. Drivers of Large Trucks in Fatal Crashes by Driver-Related Factors and Violations Recorded, 2015-2017

⁷ <https://static.tti.tamu.edu/tti.tamu.edu/documents/tti-cmv-crashes.pdf>

⁸ Ibid.

⁹ Quoted in National Academies of Sciences, Engineering, and Medicine 2008. Safety Impacts of Speed Limiter Device Installations on Commercial Trucks and Buses. Washington, DC: The National Academies Press.

¹⁰ Hu, Wen. “Raising the Speed Limit from 75 to 80 Mph on Utah Rural Interstates: Effects on Vehicle Speeds and Speed Variance.” *Journal of Safety Research*, vol. 61, 2017, pp. 83–92., doi:10.1016/j.jsr.2017.02.006.

¹¹ http://www.landlinemag.com/story.aspx?storyid=73659#.XKOHD_ZFxpY

¹² Fatality Analysis Reporting System (FARS)

Fact v. Fiction on Heavy Vehicle Speed Limiters

***Fiction:** A speed limiter mandate would impose an unreasonable burden on small carriers and owner operators.*

FACT:

As the FMCSA noted in the NPRM, speed-limiting devices have been built into most big rigs since the 1990s.¹³ Thus there would be no capital expense required to include them on trucks with this technology already equipped in their engine control units.

The agency also recognizes that trucking companies who do not yet limit their trucks can derive a financial benefit that has already been realized by companies that do limit their trucks: a “likely, [drastic reduction in] the amount of speeding citations received by heavy vehicle operators on roads with posted speed limits of 65 mph and greater.”¹⁴ This is in addition to the fact that the “rulemaking is expected to result in large fuel savings to the trucking industry as a whole... [with the agency estimating that] 30 percent of the fuel savings resulting from the proposed rule would be realized by small trucking companies.”¹⁵

In short, there is not any clear evidence that speed limiters impact small owner-operators and trucking companies’ top lines, but there is overwhelming evidence that using speed limiters positively affects their bottom lines.

***Fiction:** Roads with uniform speed limits are safer than roads with differential speed limits for cars and trucks.*

FACT:

According to a final report prepared for the Michigan Department of Transportation by Savolainen et al., which looked at data from 1999 through 2011, results showed traffic fatalities to increase consistently with maximum speed limits in rural environments... and that truck- and bus-involved fatalities on rural interstates were 20.5 percent higher in states with uniform speed limits as compared to states with differential limits for larger vehicles.¹⁶ This is of note considering that “approximately 57 percent of all fatal crashes involving large trucks occurred in rural areas.”¹⁷

¹³ US Department of Transportation (2012), Research on the Safety Impacts of Speed Limiter Device Installations on Commercial Motor Vehicles: Phase II

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Savolainen, P., T. Gates, E. Hacker, A. Davis, S. Frazier, B. Russo, E. Rista. 2014. Evaluating the Impacts of Speed Limit Policy Alternatives . Publication RC-1609. Michigan Department of Transportation, 2014

¹⁷ Large Truck and Bus Crash Facts 2017 Early Release; Crashes Table 5. Fatal Crashes Involving Large Trucks by Land Use and Function System, 2015-2017

Fact v. Fiction on Heavy Vehicle Speed Limiters

***Fiction:** A speed limiter mandate would cause major traffic jams throughout the country.*

FACT:

Many of the most-profitable trucking companies in the United States have speed limited their trucks for years, sometimes for decades. Werner Enterprises (Nebraska),¹⁸ C.R. England (Utah),¹⁹ J.B. Hunt (Arkansas),²⁰ Schneider (Wisconsin),²¹ YRC (Kansas),²² and Covenant Transportation Group, Inc. (Tennessee)²³ – to name a few – all speed their trucks and cumulatively operate tens of thousands of trailers and travel several billion miles each year, traveling all over the country, including in states that have speed limits that exceed the maximum speed their trucks can operate. Nevertheless, none of these companies reported that their trucks experienced additional difficulties in higher-speed states, nor has any of them reversed their decision to speed limit their fleets.

¹⁸ <https://www.regulations.gov/document?D=FMCSA-2014-0083-4451>

¹⁹ <https://www.regulations.gov/document?D=FMCSA-2014-0083-4554>

²⁰ <https://truckingalliance.org/the-alliance/>

²¹ <https://www.regulations.gov/document?D=FMCSA-2014-0083-4299>

²² <https://www.regulations.gov/document?D=FMCSA-2014-0083-4480>

²³ <https://www.regulations.gov/document?D=FMCSA-2014-0083-4461>