

National Academy Peer Review Committee Validates Criticisms of Safety Groups & Others

Insufficient Data + Inadequate Time + Flawed Study Methods = Unreliable Results

The National Academy of Sciences (NAS) established a Peer Review Committee to review the Federal Highway Administration (FHWA) conduct of the Comprehensive Truck Size and Weight Study (Study) required by Section 32801 of the Moving Ahead for Progress in the 21st Century or MAP-21 law (Pub.L. 112-141). The NAS Committee just issued a report, *First Report: Review of Desk Scans* (NAS Report), on the progress of the Study. The NAS Report reviews the FHWA's "desk scans" which are "surveys of past research and analysis methods for estimating the effects of changes in truck size and weight limits." (NAS Report at page 1). The NAS Report is a politely-worded condemnation of poorly executed first steps by the FHWA. The NAS Report makes three critical points:

(1) There are "significant weaknesses" in each of the methods available for analyzing data and the consequences of changes in truck size and weight limit regulations.

The lack of appropriate methodology means that the Study will not be able to predict the impact of truck size/weight policy changes on safety, the environment and enforcement with a high degree of accuracy. As a result, policy options would be based on *uncertain analyses that could lead to poor decision-making*.

The Report points out that the NAS found the same "significant weaknesses" in the data and methods of the previous Comprehensive Truck Size and Weight Limits Study (FHWA, 2000). As a result, an NAS panel concluded that "it is not possible to predict the outcomes of regulatory changes with high confidence." (NAS, Transportation Research Board 2002). The NAS Report states that the agency's review of the scientific literature in the field (desk scans) "do not show that this shortcoming of such studies has been greatly reduced." (NAS Report at page 3).

(2) The Report indicates that the Study is relying on deficient methods largely because there is insufficient time to develop the appropriate methods of analysis needed to properly conduct the Study.

As each of the available methods have "significant weaknesses," the Study is likely to *yield inaccurate results*.

(3) The FHWA pre-selected the methods it wanted to use before it conducted its research.

In most cases, the methods of analysis that have been chosen for use in the Study were not picked as a result of the literature review and search for relevant methods (desk scans), but were pre-selected before the Study undertook its review. This means that the methods to be used in the Study were already selected irrespective of the search for best methods or based on the availability or the lack of availability of relevant data. According to the NAS Report, "in most cases the selection of methods appears not to have been a consequence of the desk scans." (NAS Report at page 1.) *The pre-selection of methods, and short-circuiting of the Study process, reveals a critical flaw in the Study.*