



## Parents Against Tired Truckers and Citizens for Reliable and Safe Highways

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### **Truck Size and Weight: Maintain Current Federal Truck Size and Weight Limits**

Making existing trucks heavier increases crash risk due to poorer braking and a higher proclivity for roll over. It also results in more force and destruction in crashes. Bigger, heavier trucks produce more roadway and bridge wear and compromise existing infrastructure. Studies have shown that longer, heavier trucks operate with lower safety margins on both interstate and lower class roads. The TSC strongly opposes increasing double trailers from 28-feet to 33-feet, raising the federal truck weight limit from 80,000 lbs. to 91,000 lbs., or allowing any special interest exemptions or any “state option” to increase truck size and weight limits. The Department of Transportation’s recommendation to make no changes to truck size and weight due to profound data limitations in the Comprehensive Truck Size and Weight Study should be followed.

### **Supply Chain Accountability: Minimum Insurance Levels, Compliance, Safety, Accountability (CSA), Shipper-Broker Liability**

Minimum levels of insurance for trucks have not been increased in over 35 years and are woefully deficient. Consequently a very large portion of the damages and losses caused by elements of the trucking industry are imposed upon the American motoring public. If all of the industry were required to absorb the losses it causes, there would be significant changes which would result in safer highways for all. The Truck Safety Coalition (TSC) endorses regulatory and legislative actions that would increase minimum insurance levels immediately, and regular, periodic evaluations to provide for future increases necessitated by inflation and rising health care costs. The TSC supports protecting enforcement programs such as FMCSA’s CSA program to remain public, retain collection of all crash data and prevent data corruption. TSC firmly opposes any shielding of responsibility based on low standards related to the hiring decisions by brokers and shippers. Reducing standards effectively removes safety from the carrier selection process.

### **Fatigue: Reduce Truck Driver Fatigue and Fatigue Related Crashes, and Address Sleep Apnea**

The DOT and the National Transportation Safety Board (NTSB) have repeatedly cited fatigue as a major factor in truck crash causation. The current federal Hours of Service (HOS) regulations allow truck drivers to drive up to 11 hours within a 14-hour work day, a demanding and exhausting schedule. The TSC supports efforts to reduce fatigue including: stopping exemptions from HOS requirements; immediate rule-making and implementation for electronic logging devices (ELDs); supporting efforts to implement sleep apnea screening and rulemaking; overturning the suspension on the 34 hour restart rule and revert back to the 2013 34 hour restart provisions, which required that the restart period contain two periods between 1 a.m. and 5 a.m. and allowed one restart every 168 hours.

### **Crash Avoidance Technologies: Require Safety Equipment**

The TSC supports requirements for proven life-saving technologies such as electronic stability control, forward collision avoidance and mitigation systems, and lane departure warning systems. The TSC supports efforts to move forward with the proposed speed governor rule, set at 65mph, immediately.

### **Truck Drivers: Interstate Teen Truckers, Entry-Level Driver Training, Schedule II Drugs, Truck Driver Compensation**

The TSC supports requiring federal entry-levy driver training, which will ensure that professional drivers are prepared to safely operate large trucks. The TSC opposes any provision permitting 18-20 year old interstate truck drivers. According to DOT data, all drivers ages 18-20 had a fatal crash involvement rate that was 66 percent higher than drivers age 21 years older. The TSC supports addressing the lack of oversight of schedule II drug usage by large truck drivers. Additionally, a large portion of the trucking industry is paid by the mile rather than by the hour. Consequently, truck drivers work nearly twice the hours in a normal work week, for less pay than similar industries. Paying truck drivers for every hour worked will promote healthier drivers and safer trucking by removing incentives to dangerous driving behaviors.

### **Rear/Side Underride Guards: Require Safer Rear Impact Guards and Side Panels to Protect Bikes and Cars in Crashes**

The federal government should require all trucks and trailers to be equipped with energy-absorbing rear impact guards mounted lower to the ground, with vertical supports spaced farther apart to effectively protect car occupants from death and injury in rear impact crashes. This safety technology is proven and well known. The TSC urges Congress and DOT to: immediately release the Notice of Propose Rulemaking (NPRM) for improved rear underride guards; accelerate the process for research and rulemaking for side underride protection systems, and for front underride guards, and require improved data collection to better evaluate trailer design and its impact on safety.

*A partnership between the Citizens for Reliable and Safe Highways (CRASH) Foundation, and Parents Against Tired Truckers (P.A.T.T), the Truck Safety Coalition is comprised of the families and friends of truck crash victims and truck crash survivors. We are the only group focused on assisting victims of truck crashes and improving public policy on truck safety issues.*