June 11, 2020

The Honorable Peter DeFazio
United States House of Representatives
Chairman, U.S. House Committee on Transportation and Infrastructure
2251 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman DeFazio:

As you know all too well, the coronavirus (COVID-19) pandemic has been devastating for our country and presented numerous day-to-day challenges for Americans, including how we obtain food and household items.

New habits have formed, including an overwhelming reliance on e-commerce. This new post-COVID consumer reality accounts for a growth of 15 percent of total retail sales; this could grow to 25 percent, according to Korn Ferry as approximately 100 million people shift temporary habits to permanent habits. Morning Consult reinforced this reality with a recent poll, showing 28 percent of U.S. adults are now spending more online. Each item ordered is a delivery.

The trucking industry that moves over 70 percent of goods is facing challenges with supply chains and struggling to keep up with increased demand. CBS News noted, “Supply chains have to keep moving if we are going to overcome this pandemic and get food from where it is produced to where it is needed.” We must look for clear and clean transportation efficiencies across all modes in this post-COVID economy and beyond.

Americans for Modern Transportation represents the nation's largest shippers, carriers and retailers, and we have a solution. We are committed to improving the safety and efficiency of America’s transportation system and modernizing the delivery of products across the country’s highway network. Our mission is more critical today and we urge you to consider the benefits of allowing a modest five-foot length increase to the existing national standard for twin trailers. Twin 33s are already approved to operate in 20 states and increasing the twin trailer standard from 28 feet to 33 feet nationwide would encourage immediate private sector manufacturing investments, put workers first by supporting domestic jobs, help to support
our economic recovery and bring meaningful long-term transportation benefits to help future generations. Notably, twin 33s would abide by the current 80,000 lb. weight limit and only operate on the federal highway network—not on city streets or local roads. Most importantly, this solution would bring immediate benefit to the U.S. transportation system and it comes at no cost to taxpayers.

According to research by Ronald R. Knipling, PhD, twin 33 configurations would be safer on highways than current configurations; twin 33s are more dynamically stable at highway speeds and are more stable during abrupt evasive maneuvers and less likely to roll over. Moreover, twin 33s would include the latest in automatic braking, electronic stability control and other advanced safety features that are already being deployed on large fleets and are helping to ensure that highways are safer than ever before.

Additionally, as we look for greener transportation efficiencies, AMT’s solution will drive environmental gains. The adoption of twin 33’ trailers equates to 274 million fewer gallons of fuel, 3.12 million fewer tons of CO2 emissions and 3.36 billion fewer vehicle miles traveled with transportation efficiencies. Furthermore, studies have shown that twin 33’ trailers can move the same amount of freight with 18 percent fewer truck trips, reducing congestion and allowing consumers and businesses to realize the $2.8 billion annually in lower shipping costs with quicker delivery times.

Finally, the 2016 Comprehensive Truck Size and Weight Limits study included incorrect assumptions about the weight of twin 33’ trailers and modal shift, causing material errors in the calculated stopping distance and pavement impact. The U.S. Department of Transportation (DOT) has recognized the flaw and the shortcomings of the 2016 study and has asked AMT members to provide exact weight data for twin 33s to researchers and DOT leadership. This data will allow DOT to correct earlier assumptions. Therefore, we believe information included in this report, once released, could provide important guidance as you continue to craft surface transportation legislation.

We thank you for your leadership as you look to make improvements for future generations. We respectfully ask for your consideration to modernize outdated regulations and allow twin 33s to operate for the benefit of our nation’s consumers, businesses, environment and overall safety.

Sincerely,

The Americans for Modern Transportation Coalition