

September 14, 2020



The Honorable Elaine L. Chao
Office of the Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Chao:

We are encouraged by the Administration's focus to reevaluate efficiencies and infrastructure improvements with the [National Freight Strategic Plan](#) to support safe, efficient, and reliable goods movement.

[Americans for Modern Transportation](#) (AMT) represents the nation's largest shippers, carriers and retailers. We are committed to improving the safety and efficiency of America's transportation system and modernizing the delivery of products across the country.

As the [National Freight Strategic Plan](#) stated, "Trucks are involved in the movement of most goods... Trucks carry nearly 72 percent of all domestic freight by weight and 73 percent by value." And with the increase in population and accelerated e-commerce growth, demands for faster and cheaper delivery of goods has overwhelmingly increased. [Experts](#) and [polls](#) only forecast future growth in these trends. Thus, AMT's continued call to modernize an outdated trailer length rule, set [nearly 40 years ago](#) and would harmonize trailer regulations across state lines.

As you continue to explore innovative solutions to meet the growing needs of our nation, we hope that you will consider AMT's proposal to allow a modest five-foot length increase to the existing national standard for twin trailers. Twin 33s would still operate under the existing federal cap on weight at 80,000 pounds. AMT members continue to create new jobs to maintain service as demand climbs to year-round holiday levels. Increasing the twin trailer standard from 28 feet to 33 feet would support "Made in the USA" manufacturing investments, make the U.S more competitive in logistics, support domestic jobs, boost the U.S. economy and bring meaningful long-term transportation infrastructure improvements. **Most importantly, this solution comes at no cost to taxpayers and would create immediate investments.**

Additionally, produce and food industries are highly dependent upon efficient transportation flows to deliver fresh and high-quality items quickly. As the [National Freight Strategic Plan](#) highlighted, "Agricultural products move predominantly by truck..." AMT's plan would allow for an increase of 18.6 percent in trailer volume, allowing two additional pallets per Twin 33 trailer. This efficiency would save billions in shipping costs and streamline operations. Furthermore, it would reduce millions of hours of congestion; saving time and money, and increasing productivity. Most importantly, **it would bring certainty to industries.**

As you can see, our mission is more critical today to ensure supply chain certainty with the flow of foods and consumer goods due to [the demand increase](#) and the ongoing [driver shortages](#).

AMT's plan fits with the principles to guide the department's leadership with future goods movement. Additionally, the Twin 33s modernization meets each of the strategic goals outlined in the National Freight Strategic Plan:

Safety

- 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.
- Nationally, twin-trailer trucks have crash rates that are among the lowest in trucking, and among all types of motor vehicles.

Infrastructure

- AMT's proposal would result in 3.36 billion fewer truck miles traveled each year, substantially reducing the impact on roads and bridges.
- The use of Twin 33' trailers would decrease the stress on bridges – given the longer distribution for the weight on a longer trailer.
- Twin 33s would maintain the existing federal cap on weight at 80,000 pounds, there would not be an increase in the wear and tear on infrastructure.

Innovation

- 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.
- Twin 33s would move the same amount of freight with 18 percent fewer truck trips, allowing consumers and businesses to realize the \$2.6 billion annually in lower shipping costs with quicker delivery times

More about AMT's plan is available on AMT's [website](#), in the [myth v. fact](#) and in this [report](#).

We applaud your ongoing efforts to quickly identify ways to aid those that are most in need and to restore the confidence that will help our nation rebound to its full potential. AMT remains thankful for the recent conversations with staff and we look forward to a continued dialogue.

Sincerely,



Randy Mullett
Executive Director, The Americans for Modern Transportation Coalition