



AMERICANS  
FOR MODERN  
TRANSPORTATION

October 4, 2021

The Honorable Gina Raimondo  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, D.C. 20230

The Honorable Tom Vilsack  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, D.C. 20250

The Honorable Pete Buttigieg  
Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

Dear Secretaries Raimondo, Vilsack, and Buttigieg:

We applaud the Biden Administration's whole-of-government approach to identify solutions to address supply chain constraints. The members of [The Americans for Modern Transportation \(AMT\) Coalition](#) appreciated our conversation with the Advisory Committee on Supply Chain Competitiveness Workforce Development Subcommittee on how AMT's proposal with increased efficiencies would help to alleviate impact from the ongoing driver shortage.

Our solution will reduce congestion at no cost to our government or taxpayers. It will increase [safety](#), maximize efficiency and increase [environmental](#) gains by updating an outdated rule to allow a modest five-foot increase to twin 28' trailers. AMT's plan includes immediate sustainability points; the widespread adoption of twin 33' trailers [would equate](#) to 274 million fewer gallons of fuel consumed, 3.12 million fewer tons of CO2 emitted, and 3.36 billion fewer vehicle miles traveled with associated transportation efficiencies.

Additionally, the [multiplier](#) effect will encourage domestic private sector manufacturing investments, putting U.S. workers first by improving domestic wages with meaningful long-term transportation benefits to support domestic manufacturing.

Efficient goods movement is essential to our national security, our economic security, and our competitiveness. Federal Reserve Chair Jerome H. Powell recently [said](#), "... reflecting the effects of the virus and supply constraints, forecasts from FOMC participants for economic growth this year have been revised somewhat lower since our June Summary of Economic Projections, but participants still foresee rapid growth."

Twin 33s are already [allowed to operate](#) in 20 states; however, they are not able to run in a connected network. A strong logistics and transportation delivery system will have long-lasting benefits as "trucks carry nearly 72 percent of all domestic freight by weight and 73 percent by value," according to the latest [National Freight Strategic Plan](#). The U.S. Department of Transportation [estimated](#) in 2016 that by 2045, total freight across all modes would reach 25 billion tons valued at \$37 trillion. We are years ahead of projected freight growth. Our country can't possibly build 50 percent more lane miles in 25 years. The cost and schedule are [impossible](#) to meet with the increase of ecommerce. Twin 33s would abide by the current 80,000 lb. weight limit and primarily operate on the federal highway network—NOT on city streets or local roads.

Increasing the twin trailer standard from 28 feet to 33 feet would allow two additional pallet spaces per trailer, bringing instant capacity and efficiency improvements for small, medium, and large business customers across a range of industries from retail to hospitality to [our food supply](#).

Most importantly, our proposal will improve safety on our roads with a suite of [safety enhancements](#). According to [research](#) by Ronald R. Knipling, Ph.D., twin 33' configurations are safer on highways than current configurations; twin 33s are more [dynamically stable](#) at highway speeds and are more stable during abrupt evasive maneuvers. Furthermore, the adoption of twin 33' trailers would result in [4,500](#) fewer truck accidents annually as the reduction of trucks on our roads would have tangible safety benefits.

Thank you for your leadership of the Supply Chain Disruptions Task Force and your work to address supply chain issues to "reimagine and rebuild a new American economy, not go back to the way things used to be." 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 highway safety. We would welcome the opportunity to be a resource for your departments.

Sincerely,



Randy Mullett  
Executive Director, The Americans for Modern Transportation Coalition

cc: National Security Advisor Jake Sullivan  
cc: Director of the National Economic Council Brian Deese