



June 5, 2015

The Honorable Bill Shuster
Chairman, Committee on Transportation
and Infrastructure
U.S House of Representatives
Washington, DC 20515

Dear Chairman Shuster:

The U.S. Department of Transportation is releasing for public comment and peer review the technical reports of the Federal Highway Administration's (FHWA) comprehensive study of certain safety, infrastructure, and efficiency impacts surrounding potential changes to the Federal truck size and weight (TS&W) limits. This study is required by the Moving Ahead for Progress in the 21st Century Act (MAP-21; P.L. 112-141, §32801) which dictated very precise parameters for the study's scope. The FHWA will consider any comments from the peer review of the study to be conducted by the Transportation Research Board (TRB) and the public for the final report that we expect to deliver to Congress later this year.

FHWA's technical work was able to employ the latest modeling techniques in the areas of truck stability and control performance as well as in bridge and pavement structural impacts. It also featured the first-ever accounting of violations and citations by truck configuration in a study of this kind. Even so, the research also revealed very significant data limitations that severely hampered FHWA's efforts to conclusively study the effects of the size and weight of various truck configurations. These limitations are discussed below.

Among the data issues is the lack of descriptive information in crash reports involving trucks – especially the weight of the vehicle at the time of an incident – which undermines our ability to conduct adequate highway safety and truck crash analyses. So, while FHWA was able to identify significantly higher crash rates in six-axle trucks compared to five-axle trucks in the State of Washington, the lack of available and consistently reported data from other states prevented the Department from drawing national conclusions on the crash rates of this and other truck configurations. We also were constrained in fully accounting for modal shift of freight traffic to short line and regional railroads due to the absence of publicly available data in this area. Our modeling did suggest one potentially important finding: that the expected Vehicle Miles Traveled (VMT) reductions that might result from heavier or larger trucks would be relatively small, resulting in little noticeable impact to real freight VMT.

Other data limitations, which are fully explored in the attached technical studies, include:

- The profound absence of weight data in crash reporting, which prevents us from knowing whether trucks were fully loaded, at legal capacity for their axle configurations, had unevenly distributed weight, or were running overweight prior to a crash.

- The lack of acceptable models that can predict bridge deck deterioration over time, which makes it difficult to extrapolate long-term maintenance costs over time.
- Difficulty separating truck weight enforcement program costs from overall truck safety enforcement costs.

These findings were anticipated. The TRB's April 2014 peer review report acknowledged weaknesses in the available methods and data; however and notably, the TRB panel was not able to identify better modeling approaches or data sets that FHWA could employ. Additionally, a 2000 FHWA "Comprehensive Truck Size and Weight" report also identified many of these same insufficiencies.

The Department sought the input of the public and subject matter experts, including members of academia in an effort to overcome these limitations and provide expertise and objective analysis. We held several public meetings and webinars to solicit feedback on the data, methodology, and prior work, as well as to share the status of the study effort. Additionally, we made information on the project plans available on our website, and invited comments from the public. We used only data available to the public to maximize the transparency of the Department's work. Despite our efforts, these data weaknesses could not be overcome as the study progressed. The study will now be subjected to peer review and public comment. At this time, the Department believes that the current data limitations are so profound that the results cannot accurately be extrapolated to predict national impacts. As such, the Department believes that no changes in the relevant truck size and weight laws and regulations should be considered until these data limitations are overcome.

To make a genuine, measurable improvement in the knowledge needed for these study areas, a more robust study effort should start with the design of a research program that can identify the areas, mechanisms and practices needed to establish new data sets and models to advance the state of practice. This research plan could be developed by an expert panel, such as the TRB, and should include a realistic estimation of timelines and costs.

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Please feel free to contact me should you have any questions.

Sincerely,



Peter M. Rogoff
Under Secretary



**U.S. Department
of Transportation**

Office of the Secretary
of Transportation

Under Secretary for Policy

1200 New Jersey Avenue SE
Washington, DC 20590

June 5, 2015

The Honorable Eleanor Holmes Norton
Ranking Member, Subcommittee on Highways and Transit
Committee on Transportation and Infrastructure
U.S House of Representatives
Washington, DC 20515

Dear Congresswoman Holmes Norton:

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Peter M. Rogoff
Under Secretary



June 5, 2015

The Honorable Peter DeFazio
Ranking Member, Committee on Transportation
and Infrastructure
U.S House of Representatives
Washington, DC 20515

Dear Congressman DeFazio:

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Peter M. Rogoff
Under Secretary



June 5, 2015

The Honorable Sam Graves
Chairman, Subcommittee on Highways and Transit
Committee on Transportation and Infrastructure
U.S House of Representatives
Washington, DC 20515

Dear Chairman Graves:

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Peter M. Rogoff
Under Secretary



**U.S. Department
of Transportation**

Under Secretary for Policy

1200 New Jersey Avenue SE
Washington, DC 20590

Office of the Secretary
of Transportation

June 5, 2015

The Honorable John Thune
Chairman, Committee on Commerce, Science
and Transportation
United States Senate
Washington, DC 20510

Dear Chairman Thune:

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Under Secretary



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1200 New Jersey Avenue SE
Washington, DC 20590

Office of the Secretary
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June 5, 2015

The Honorable Bill Nelson
Ranking Member, Committee on Commerce, Science
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United States Senate
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1200 New Jersey Avenue SE
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Office of the Secretary
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The Honorable Cory Booker
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Dear Senator Booker:

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These findings were anticipated. The TRB's April 2014 peer review report acknowledged weaknesses in the available methods and data; however and notably, the TRB panel was not able to identify better modeling approaches or data sets that FHWA could employ. Additionally, a 2000 FHWA "Comprehensive Truck Size and Weight" report also identified many of these same insufficiencies.

The Department sought the input of the public and subject matter experts, including members of academia in an effort to overcome these limitations and provide expertise and objective analysis. We held several public meetings and webinars to solicit feedback on the data, methodology, and prior work, as well as to share the status of the study effort. Additionally, we made information on the project plans available on our website, and invited comments from the public. We used only data available to the public to maximize the transparency of the Department's work. Despite our efforts, these data weaknesses could not be overcome as the study progressed. The study will now be subjected to peer review and public comment. At this time, the Department believes that the current data limitations are so profound that the results cannot accurately be extrapolated to predict national impacts. As such, the Department believes that no changes in the relevant truck size and weight laws and regulations should be considered until these data limitations are overcome.

To make a genuine, measurable improvement in the knowledge needed for these study areas, a more robust study effort should start with the design of a research program that can identify the areas, mechanisms and practices needed to establish new data sets and models to advance the state of practice. This research plan could be developed by an expert panel, such as the TRB, and should include a realistic estimation of timelines and costs.

As stated above, we are providing the technical reports from the study effort for peer review and public comment. FHWA will provide you with a final report once it incorporates these additional observations into the Study. In addition to the technical reports, attached is a summary sheet of the steps with the findings of this study.

Please feel free to contact me should you have any questions.

Sincerely,



Peter M. Rogoff
Under Secretary



June 5, 2015

The Honorable Jim Inhofe
Chairman, Committee on Environment
and Public Works
United States Senate
Washington, DC 20510

Dear Chairman Inhofe:

The U.S. Department of Transportation is releasing for public comment and peer review the technical reports of the Federal Highway Administration's (FHWA) comprehensive study of certain safety, infrastructure, and efficiency impacts surrounding potential changes to the Federal truck size and weight (TS&W) limits. This study is required by the Moving Ahead for Progress in the 21st Century Act (MAP-21; P.L. 112-141, §32801) which dictated very precise parameters for the study's scope. The FHWA will consider any comments from the peer review of the study to be conducted by the Transportation Research Board (TRB) and the public for the final report that we expect to deliver to Congress later this year.

FHWA's technical work was able to employ the latest modeling techniques in the areas of truck stability and control performance as well as in bridge and pavement structural impacts. It also featured the first-ever accounting of violations and citations by truck configuration in a study of this kind. Even so, the research also revealed very significant data limitations that severely hampered FHWA's efforts to conclusively study the effects of the size and weight of various truck configurations. These limitations are discussed below.

Among the data issues is the lack of descriptive information in crash reports involving trucks – especially the weight of the vehicle at the time of an incident – which undermines our ability to conduct adequate highway safety and truck crash analyses. So, while FHWA was able to identify significantly higher crash rates in six-axle trucks compared to five-axle trucks in the State of Washington, the lack of available and consistently reported data from other states prevented the Department from drawing national conclusions on the crash rates of this and other truck configurations. We also were constrained in fully accounting for modal shift of freight traffic to short line and regional railroads due to the absence of publicly available data in this area. Our modeling did suggest one potentially important finding: that the expected Vehicle Miles Traveled (VMT) reductions that might result from heavier or larger trucks would be relatively small, resulting in little noticeable impact to real freight VMT.

Other data limitations, which are fully explored in the attached technical studies, include:

- The profound absence of weight data in crash reporting, which prevents us from knowing whether trucks were fully loaded, at legal capacity for their axle configurations, had unevenly distributed weight, or were running overweight prior to a crash.

- The lack of acceptable models that can predict bridge deck deterioration over time, which makes it difficult to extrapolate long-term maintenance costs over time.
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Sincerely,



Peter M. Rogoff
Under Secretary



**U.S. Department
of Transportation**

Under Secretary for Policy

1200 New Jersey Avenue SE
Washington, DC 20590

Office of the Secretary
of Transportation

June 5, 2015

The Honorable Barbara Boxer
Ranking Member, Committee on Environment
and Public Works
United States Senate
Washington, DC 20510

Dear Senator Boxer:

The U.S. Department of Transportation is releasing for public comment and peer review the technical reports of the Federal Highway Administration's (FHWA) comprehensive study of certain safety, infrastructure, and efficiency impacts surrounding potential changes to the Federal truck size and weight (TS&W) limits. This study is required by the Moving Ahead for Progress in the 21st Century Act (MAP-21; P.L. 112-141, §32801) which dictated very precise parameters for the study's scope. The FHWA will consider any comments from the peer review of the study to be conducted by the Transportation Research Board (TRB) and the public for the final report that we expect to deliver to Congress later this year.

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Under Secretary



**U.S. Department
of Transportation**

Under Secretary for Policy

1200 New Jersey Avenue SE
Washington, DC 20590

Office of the Secretary
of Transportation

June 5, 2015

The Honorable David Vitter
Chairman, Subcommittee on Transportation and Infrastructure
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

Dear Senator Vitter:

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