



September 16, 2015

The Honorable Reid Ribble  
1513 Longworth HOB  
Washington, DC 20515

Dear Congressman Ribble:

The Truckload Carriers Association (TCA) is the only national trade association whose sole focus is the truckload segment of the trucking industry. As a major part of an industry consisting of over 524,000 companies within the U.S., operating millions of power units, TCA and its trucking company members are vitally interested in the recently introduced Safe, Flexible, and Efficient (SAFE) Trucking Act. The SAFE Trucking Act (H.R. 3488) contains language that would allow individual states to decide whether or not they want to allow freight shipping trucks to carry a maximum of 91,000 pounds with the addition of a sixth axle, up from the current 80,000 pounds standard. While this provision attempts to improve trucking productivity on our highways, it clearly would only benefit a minority of the industry. For this reason, TCA opposes H.R. 3488.

The most readily apparent equipment modification necessary for 91,000 lbs./6 axle configurations would be retrofitting a trailer with a third axle. However, in addition to the third axle on a trailer, carriers would also need to consider trailer reinforcements, kingpin upgrades, and engine improvements in order to accommodate the increased weight.

The cost to complete a trailer retrofit varies based on a trailer's manufacturer and its configuration for use in five-axle operations. The approximate cost to add the extra axle and lengthen (for dry vans) or replace (for refrigerated trailers) the axle slide bar ranges between \$3,000 and \$4,800 per trailer. The additional axle adds between 2,000 and 2,500 pounds to the trailer's weight and has an average 0.5 mpg negative impact on fuel economy. This is what is commonly referred to in the industry as "rolling resistance" and occurs with the additional axle, regardless of whether or not the trailer is loaded.

To accommodate 11,000 additional pounds for the 91,000/6 configuration, most carriers would also need to upgrade their tractors. Tractors with larger, higher torque-rated engines and heavier-duty kingpins would likely be necessary. Retrofitting current tractors with the upgrades could cost approximately \$10,000 per tractor. New tractors with the necessary features for 91,000/6 would cost an additional \$5,000 to \$7,000 more than tractors with standard (350-400 hp) engines with some estimates placing the premium as high as \$20,000. Additionally, carriers would likely want to consider switching to tires with higher ratings (going from G-rated to H-rated) and altering their tire maintenance schedules. H-rated tires would incur an increased cost of the price of new tires.

Based on these figures, it could cost most carriers anywhere between \$8,000 and \$24,800, *per tractor-trailer*, to upgrade their equipment to haul the additional 11,000 pounds. Because of the extra weight of the third axle, the additional weight allotment would actually be closer to 8,000 to 8,500 pounds.

The truckload industry simply cannot afford the adoption of a policy which would support allowing 91,000 pounds on 6 axles. Truckload's experience with prior industry shifts (maximum trailer length increasing to 53 from 48 feet, GVW increasing from 73,280 to 80,000 pounds) suggests that the market will not encourage the operation of equipment that doesn't meet the maximum allowed size. As has happened before, maximum limits would become the norm and carriers would face tremendous pressure to adjust their equipment to accommodate 91,000/6 despite the fact that they will likely never recoup the costs of the adjustment or haul loads requiring the sixth axle.

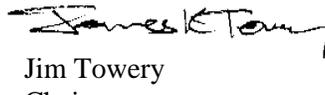
Given that carriers are unlikely to see rate increases to parallel the increase in load weights, an increase in allowable GVW must have a low price tag. Proponents of 91,000/6 argue that allowing this configuration would not preclude any carrier from operating current configurations, yet history suggests otherwise. Despite the fact that only 10-20 percent of truckload carriers would be able to take advantage of any increase, market pressures would require all carriers to invest in new equipment in order to remain competitive and any capital investment into existing equipment would yield little to no return.

As the trucking industry continues to support America through its commitment to delivering freight and providing jobs to Americans nationwide, TCA urges you to reconsider this proposal and find a freight productivity solution that will help to support all segments of an industry that has proven to be the backbone of the U.S. economy.

Sincerely,



Keith Tuttle  
Chairman  
Truckload Carriers Association



Jim Towery  
Chairman  
TCA Highway Policy Committee