



October 20, 2015

The Honorable Bill Shuster  
Chairman  
Committee on Transportation and Infrastructure  
U.S. House of Representatives  
2251 Rayburn House Office Building  
Washington, DC 20515

The Honorable Peter DeFazio  
Ranking Member  
Committee on Transportation and Infrastructure  
U.S. House of Representatives  
2164 Rayburn House Office Building  
Washington, DC 20515

Dear Chairman Shuster and Ranking Member DeFazio:

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 United States, operating millions of power units, the TCA and its trucking company members remain consistently focused on issues that could have a dramatic effect on the freight transportation methods currently practiced on our interstates. For this reason, we, the TCA, must oppose any and all measures that could promulgate a mandate on Twin 33-foot trailers (also known as Double 33s). At face value, this provision attempts to improve trucking productivity on our highways, yet in reality, it clearly only benefits a minority of the industry.

The TCA recognizes the benefits that would be bestowed upon a Less-Than-Truckload (LTL) industry by adding additional cubic feet of freight space and how those benefits add to productivity, however, we would be remiss if we did not mention that the truckload industry, an industry that represents 78 percent of the trucking sector, would yield little to any advantage of the added cubic space that a Twin 33 foot trailer would bring about. Due to the vast differences in freight delivery models, the metric of mandating Twin 33-foot trailers almost exclusively benefits Less-Than-Truckload freight.

Our experience with industry transitions suggests that the shipping community will not support equipment that does not meet the maximum size allowed. When our industry experienced a previous trailer conversion from a 48-foot to a 53-foot trailer, the financial burden was dramatic. Lauded as a voluntary change, it became a change that fleets were expected to make after receiving zero financial assistance from the shipping community. A change to Twin 33-foot trailers will not be viewed any differently.

As always, the TCA encourages innovative thinking, but it is certainly fair to note that a mandate allowing Twin 33-foot trailers would increase the costs of delivering freight with the use of such a configuration. A decrease in our industry's fuel efficiency and tire costs are just some of the

examples of expenses that we would incur and never be able to recoup. It should also be noted that any allowance to place Twin 33-foot trailers would not require a retrofit to our equipment, but rather an entirely new set of trailers, a tremendous cost burden that would be bestowed upon the vast majority of our nation's fleet of motor carriers.

The TCA would also be remiss if we did not examine the affects that this potential mandate would have on our existing population of drivers. As a pool that is ever shrinking by the year, any change that allows for Twin 33-foot trailers would almost immediately create a need for more drivers that do not exist. The demand from shippers to change equipment would be great, but the absence of drivers with a doubles/triples endorsement would be far greater. Faced with a growing driver shortage now, what would our industry do when faced with drivers that lacked the proper credentialing and training? Fleets would incur expenses of training or retraining drivers to obtain this endorsement and a cost that again, could not be recouped.

When it comes to drivers, our members also are concerned about the increased potential for driver injuries associated with twin trailers. Breaking apart double trailers to put them on the dock and then reassemble them and the connecting gear or converter dolly is a known high injury activity in the trucking industry for the LTL segment. Operating and assembling a tractor-trailer is physically demanding work and the strain of this work increases greatly with the size of the truck. Although our drivers have weathered many changes over the years, requiring them to break up a set of twin trailers four times on each load and manhandle a 3,000-lb. converter-gear is simply too much to ask. As our workforce ages, the last thing we can afford as an industry is a setback to our efforts to improve the job and enhance our drivers' quality of life.

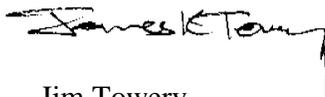
Finally, our industry must clearly comply with the Federal Motor Carrier Safety Regulations (FMCSRs). In our compliance efforts, coupled with our flexible and irregular routes, our drivers must always be able to find places to park and obtain adequate rest. Any changes to trailer length by adding a minimum of ten extra feet will exacerbate an already troublesome truck parking problem. An allowance of Twin 33-foot trailers will instantly antiquate a vast majority of usable parking spaces that our industry will normally reserve for a tractor and its 53-foot trailer, thus creating a parking lot full of trucks that could interfere with the flow of parking lot traffic, and creating an even larger parking problem than the one recently outlined in the Federal Highway Administration's (FHWA) Jason's Law Truck Parking Survey Results and Comparative Analysis.

As the trucking industry continues to support America through its commitment to deliver freight and provide jobs to Americans nationwide, TCA urges you to reconsider the Twin 33-foot trailer configuration 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