



February 2, 2017

The Honorable Bill Shuster, Chair, Committee on Transportation and Infrastructure
The Honorable Peter DeFazio, Ranking Member, Committee on Transportation and Infrastructure
The Honorable Sam Graves, Chair, Subcommittee on Highways and Transit
The Honorable Eleanor Holmes Norton, Ranking Member, Subcommittee on Highways and Transit
U.S. House of Representatives
Washington, D.C. 20515

Dear Leaders of the House Committee on Transportation and Infrastructure and Subcommittee on Highways and Transit,

As you know, our country faces the tremendous challenge of supporting the “backbone of the U.S. economy,” our nation’s infrastructure. The process undertaken by this committee will be tasked with developing sound solutions geared toward improving upon the maze of roadways, waterways, and rail transit that has crumbled into near-disrepair, a far cry from the premiere freight delivery platform that it had once proven to be. As the committee embarks on this onerous task, the theory of addressing our nation’s truck size and weight provisions will surely be brought to the forefront as a productivity solution to aid in freight delivery during our time of reconstruction. Unfortunately, gaining productivity through increased trailer sizes benefits only a small population of our nation’s freight industry.

Lauded as an opportunity to remove trucks from our roads, Twin 33-foot trailers will actually have the opposite effect. In an effort to supplement and improve upon intermodal operations, our nation’s railroad container cars have been developed to accommodate the most prominent trailer configurations that exist within trucking today, the 28- and 53-foot trailers. You will soon realize that any change to these foundational trailer sizes will not only render existing truck trailers obsolete, but their corresponding railroad counterparts as well.

The truckload segment of the trucking industry is vast, representing over 500,000 motor carriers equating to 78 percent of the freight moved by truck, based on revenue. Our industry recognizes the benefits that would be bestowed upon our Less-Than-Truckload (LTL) associates by adding additional cubic feet of freight space and how those benefits add to their productivity; however, the truckload industry would yield little, if any, advantage of the added cubic space that Twin 33-foot trailers would generate. Due to the vast differences in freight delivery models, the metric of mandating Twin 33-foot trailers almost exclusively benefits LTL freight, thus putting the truckload segment of the industry at a competitive disadvantage.

It is important to note that the trucking industry is deeply divided on this issue. When the trucking industry experienced a previous trailer conversion from 48-foot trailers to 53-foot trailers, the financial burden was dramatic, and any change from 53-foot trailers would be no different. Pricing models and logistics configurations would prevent the truckload segment of the industry from regaining any dollars invested in new 33-foot trailers. A shift to 33-foot trailers would be considered voluntary, and the shipping community would automatically transition to carriers with the most cubic space for their goods, rendering our nation’s fleet of 53-foot trailers nothing more than antiques.

Notably absent from the discussions surrounding 33-foot trailers is the effect that the configuration would have on our population of drivers. As an industry that continually searches far and wide for qualified drivers to operate our vehicles, the driver ramifications of operating fleets consisting of 33-foot trailers would be severe. The truckload industry and its long haul operations are logistically assembled for longer trailer configurations rather than articulating smaller trailers bound by dollies. The majority of loading docks are designed to accommodate trailers that reverse into these docks. The Twin 33-foot trailer configuration has proven problematic to back up and would need to be separated prior to backing, an arduous task for drivers in our long haul world. The potential for driver injury when separating trailers and their 3,000-lb converter gear is high and would jeopardize any improvements to the health and well-being of drivers that our industry strives to make.

As representatives of an industry tasked with delivering our nation's freight and doing so safely, the Truckload Carriers Association (TCA) pledges to partner with our congressional leadership to discover solutions that truly benefit our industry and the American public as whole. TCA hopes to be involved in future hearings and roundtables involving this and other trailer configurations so that we can assure that the bulk of our industry is truly represented. As discussions surrounding the topic of productivity begin to propagate over the coming months and years, TCA seeks to unite with all who have a vested interest in freight delivery solutions that work for everyone.

Sincerely,

A handwritten signature in black ink, appearing to read "John Lyboldt", with a large, sweeping flourish extending to the left.

John Lyboldt
President