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PRESS RELEASE

On 17 August 2017, TTMA received letters from both EPA and NHTSA stating that they have reviewed our petitions for reconsideration of the new greenhouse gas regulations for heavy-duty trailers and they agree that further rulemaking is needed. The reasons for our petitions to these agencies, and our earlier petition in the United States Court of Appeals for the District of Columbia on 22 December 2016, still stand. Among those reasons are:

- EPA lacks authority to regulate trailers under the Clean Air Act (CAA). The CAA grants authority to the EPA to regulate *motor* vehicles – specifically, “self-propelled” vehicles. Trailers are neither motorized nor self-propelled. Trailers move a tremendous amount of goods in interstate commerce. If Congress had intended for EPA to regulate trailers, it would have included trailers in the definition of a motor vehicle when it enacted the CAA.
- TTMA has long been a supporter of the EPA SmartWay program, which provides test data and analysis of new trailer equipment such as aerodynamic side skirts and tail devices that, within limited parameters and for certain trailer uses, will promote greater fuel efficiency and reduce greenhouse gas emissions. Under this voluntary program, and considering that fuel cost is a major cost component for motor carrier operations, there is already a compelling incentive for the owners and operators of heavy trailers to add this equipment where these benefits can be achieved. But most trailers are operated in such a way as to get little or no benefit from these design changes, and these are the trailers that the new GHG2 rules would affect. EPA used unrealistic speed assumptions for trailer use when it calculated the supposed benefits of the new rules. Most trailers do not travel at the high speeds for the lengthy periods that EPA assumes. Trailers used in short haul and local delivery operations travel mostly at lower speeds and would gain no benefit from EPA’s mandated equipment. In fact, the added weight of the EPA mandated equipment will decrease fuel efficiency in these operations.
- The EPA regulations would actually result in *more* miles driven and, of greater concern, would increase highway accidents. Motor carriers must operate within defined limits for the combined weight of the tractor, trailer and cargo. The added weight of EPA’s mandated GHG2 equipment would increase the trailer weight, and in many instances this would require that some cargo be removed from the trailer and transported on a different trailer. As a result, more heavy-duty trucks would be required to operate in order to move the nation’s cargo, and on average the trucks would be heavier. Adding more and heavier trucks to the nation’s highways would produce more accidents involving these trucks, which is contrary to NHTSA’s defined mission. TTMA finds this aspect of the rulemaking particularly unreasonable.

TTMA is pleased with the agencies' progress and looks forward to full administrative review of the trailer greenhouse gas rules. Our concern remains over the implementation date of those rules, which are still scheduled to begin with January 2018 trailer production, just a few short months away. Most heavy-duty trailers are custom-ordered, and the required lead time for scheduling production means that trailer manufacturers are having to quote orders for 2018 delivery that will force customers to purchase equipment they do not want and that will not produce any fuel efficiencies in the customers' operations. Moreover, much of this equipment is still not certified by EPA, so trailer manufacturers are not certain if they can incorporate the equipment into future orders and still comply with the regulations. This is disrupting the normal ordering process and is frustrating both customers and manufacturers. TTMA hopes the implementation date will be stayed until the agencies complete their review.

The Truck Trailer Manufacturers Association (TTMA) is an international trade association representing the manufacturers of approximately 90% of the combination truck trailers produced in the United States. TTMA's defined mission includes providing a means of cooperating with the various agencies of the Federal Government in any appropriate manner which will best serve both the public and the members' interests.