



# Commercial Vehicle Safety Alliance

promoting commercial motor vehicle safety and security

October 20, 2015

The Honorable Bill Shuster  
Chairman  
Committee on Transportation & Infrastructure  
United States House of Representatives  
Washington, DC 20015

The Honorable Peter DeFazio  
Ranking Member  
Transportation and Infrastructure Committee  
United States House of Representatives  
Washington, DC 20015

The Honorable Sam Graves  
Chairman  
Highways and Transit Subcommittee  
Transportation and Infrastructure Committee  
United States House of Representatives  
Washington, DC 20015

The Honorable Eleanor Holmes Norton  
Ranking Member  
Highways and Transit Subcommittee  
Transportation and Infrastructure Committee  
United States House of Representatives  
Washington, DC 20015

Dear Chairmen Shuster and Graves, and Ranking Members DeFazio and Norton:

The Commercial Vehicle Safety Alliance (CVSA) thanks you for introducing the Surface Transportation Reauthorization and Reform Act of 2015. CVSA is an international not-for-profit organization comprised of Local, State, Provincial, Territorial, and Federal motor carrier safety officials and industry representatives from the United States, Canada, and Mexico. The Alliance represents the men and women responsible for enforcing the Federal Motor Carrier Safety Regulations and the Hazardous Materials Regulations. Our members depend on the motor carrier title of the transportation bill for guidance and funding to carry out their mission of reducing crashes and saving lives.

CVSA supports a number of the provisions included in the bill:

- Title V, Subtitle A – Motor Carrier Safety Grant Consolidation: The consolidation of grant programs within the Motor Carrier Safety Assistance Program will reduce the administrative burden on both the States and the Federal Motor Carrier Safety Administration (FMCSA), freeing up resources for other critical activities. The move to a multiyear Commercial Vehicle Safety Plan will allow the States to develop long term plans to improve safety and reduce crashes. The changes to the grants will also provide the States with more flexibility, enabling them to craft dynamic programs tailored to each States' unique needs, while maximizing the benefit of limited funds.
- Title V, Subtitle B, Part I – Regulatory Reform: The language in this section will bring much needed attention to the Federal Motor Carrier Safety Regulations (FMCSRs). The guidance review requirement will help bring the FMCSRs in line with regulatory guidance and interpretations issued by the agency, benefiting both industry and enforcement by eliminating inconsistencies and confusion in the regulations. Requiring that petitions be displayed publically will provide for improved transparency, resulting in an improved dialogue between enforcement, FMCSA, and industry. These changes will provide a more effective regulatory framework, resulting in improved compliance and more uniform and consistent enforcement activities.

- Title V, Subtitle B, Part II – Compliance, Safety, and Accountability: This section includes language calling for a study of FMCSA’s Compliance, Safety, Accountability (CSA) program, which will continue to improve the program. The section also includes language creating a program that will help recognize motor carriers for going beyond the minimum compliance standards, which will help enforcement better target unsafe operators. CVSA also supports the provision in this section that directs FMCSA to remove CSA scores from public display until issues with the program and data can be addressed.
- Title V, Subtitle C, Section 5305 – New entrant safety review program: This section calls for a comprehensive study of the New Entrant Safety Audit program. The purpose of the study is to help the agency determine the efficacy of the program and make recommendations for possible improvements.
- Title V, Subtitle E, Section 5506 – Technology Improvements: Uniform, timely, and accurate data is the cornerstone of the Motor Carrier Safety Assistance Program. Enforcement personnel, along with State and Federal agencies, use information on a motor carrier's past performance to help prioritize motor carriers for roadside inspections and compliance reviews. The study outlined in this section will help improve the quality of data collection, transmission, and analysis at FMCSA, enabling the agency and States to more accurately plan for and adjust their commercial vehicle safety programs to best meet its goal – reducing crashes and saving lives.

While the bill contains a number of provisions that will improve safety, it also includes provisions that may undermine safety and complicate enforcement, such as the language in Title V, Subtitle C, Section 5304 – Safety reporting system, which calls for consideration of a new system that would allow drivers and motor carriers to self-report vehicle defects identified en route.

While CVSA is still reviewing the details of the bill, it is clear that the Surface Transportation Reauthorization and Reform Act of 2015 does much to improve safety. CVSA looks forward to working with you, the Committee, and the House of Representatives to continue to improve this critical piece of legislation as it moves forward. Thank you again for your leadership on this issue.

Respectfully,



Collin B. Mooney  
Acting Executive Director