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America Builds: How Trucking Supports American Communities

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Introduction

Chairman Rouzer and Members of the Highways and Transit Subcommittee, I appreciate the opportunity to testify before you today on behalf of the Truckload Carriers Association (TCA).

TCA, with offices at 555 E Braddock Road, Alexandria, VA, is the only national trade association whose collective sole focus is the truckload segment of the trucking industry. The association represents dry van, refrigerated, flatbed, tanker, and rail intermodal carriers operating in 48 contiguous US states, Alaska, Mexico, and Canada. As a significant part of an industry with over half a million companies operating millions of power units within the United States, TCA, and its trucking company members regularly comment on matters affecting the national transportation industry's common interests and potential impacts.

Trucking is the backbone of the US economy, especially the truckload segment, representing about 75% of the nation's trucking freight. Our country and its corresponding states and this continent rely heavily upon our industry for the goods we deliver daily. I would be remiss if I did not stress our industry's impact on this nation. Trucking houses the homeless, feeds the children, and supplies critical medications that keep our population healthy. Our nation's army of first responders could not respond if our industry didn't deliver. In other words, if you have it, own it, use it, or eat it, chances are, the very thing we are talking about was delivered by a truck.

At TCA, our core value principles are highlighted in five major categories, which are as follows:

- Improving the driving job,
- Improving roadway safety,
- Improving the financial stability of a motor carrier,
- Promoting industry environmental stewardship and,
- Improving the industry image.

With these principles in mind, I provide my testimony before you today.

Funding

Undoubtedly, funding the highway trust fund is crucial to our nation's infrastructure.

TCA supports increasing fuel taxes, provided they are indexed to an appropriate annual cap as needed, with all generated funds dedicated to critical highway infrastructure projects.

As you know, the Highway Trust Fund (HTF) is a user-supported tax primarily used to finance the maintenance and improvement of our nation's roads and bridges, ensuring they

remain world-class. Currently, the tax stands at 18.4 cents per gallon for gasoline and 24.4 cents per gallon for diesel, which has remained unchanged since 1993. Notably, administrative costs associated with collecting these taxes account for just one percent of every dollar paid. However, the HTF continues to face persistent shortfalls because the federal government has not taken the necessary steps to ensure sustainable, long-term funding for our critical infrastructure.

At the same time, TCA strongly advocates suspending or reducing the 12% Federal Excise Tax (FET) on new heavy-duty trucks and trailers. This tax adds an average of $22,000 to the cost of each vehicle, making it more difficult for fleets to invest in newer, safer, and more energy-efficient equipment, especially amid ongoing supply chain disruptions. The high cost of the FET slows fleet modernization, directly impacting safety and environmental goals. In fact, 60% of fleets report they would be somewhat or very likely to purchase more trucks if the FET were eliminated.[1] Removing this outdated tax would accelerate the adoption of cleaner, safer trucks, fostering a more efficient and sustainable trucking industry.

Truck Parking

Truck parking remains one of TCA's top priorities on Capitol Hill. Every day, drivers are forced to park unsafely along highway shoulders and interstate entry and exit ramps due to a severe lack of available parking. With only 313,000 designated truck parking spaces nationwide, it is nearly impossible to accommodate the 3.5 million drivers who need safe and adequate parking. The US Department of Transportation's 2019 Jason's Law Report found that 98% of drivers struggle to find parking, and the shortage exists in every state and region.[2] More than half of state departments of transportation have identified truck parking as a critical issue in their freight plans and parking studies, an issue TCA is prepared to address with this subcommittee.

The American Transportation Research Institute's 2024 Critical Issues in the Trucking Industry report confirms that truck parking availability is the number one concern among drivers. Due to the lack of parking, drivers are often forced to stop before reaching their maximum available drive time or take detours off their routes, resulting in an average of $7,105 in lost compensation annually. This financial burden is a significant concern for our nation's hardworking drivers. Alarmingly, 70% of drivers have had to violate hours-of-

[1] Cannon, Jason. "How the Suspension of FET Could Benefit Trucking Industry." Commercial Carrier Journal, 4 Aug. 2020, www.ccjdigital.com/business/article/14939712/how-the-suspension-of-fet-could-benefit-trucking-industry.
[2] Jason's Law Truck Parking Survey Results and Comparative Analysis USDOT; 2019.

service rules to find parking, and 96% have been forced to park in locations not designed for trucks.[3]

The shortage is especially concerning for women in the industry, who make up 12.1% of the professional truck driver workforce.[4] When female drivers are forced to park in unsafe locations, such as dimly lit areas or isolated spots, they face a heightened risk to their safety, making the need for secure parking even more urgent.

TCA has been actively engaging with Members of Congress on The Truck Parking Safety Improvement Act, which was reintroduced in the House last month. This legislation proposes $755 million to expand commercial motor vehicle parking nationwide over the next five years. If passed, states, municipalities, and private commercial rest stops, such as Pilot Flying, would be eligible for funding. I want to personally thank Representatives Bost, Carbajal, and Stauber, all members of this subcommittee, for reintroducing this piece of legislation. Mr. Bost, you have been a champion for the trucking industry, and for that, TCA thanks you. In the previous Congress, the bill received strong bipartisan support with 53 co-sponsors—27 Democrats and 26 Republicans—demonstrating widespread recognition of the need for action and the unity behind this crucial cause.

I strongly urge you to include the truck parking language in the next highway reauthorization bill. The 2021 Infrastructure Investment and Jobs Act (IIJA) failed to allocate dedicated funding for truck parking initiatives. This oversight must be corrected to ensure the safety and efficiency of our nation's trucking workforce.

Hair Follicle Testing & Reclassification of Marijuana

The road to obtaining a CDL, through testing and examinations, is critical, and creating a qualified professional driver is ultimately the end game. That being said, TCA has always supported the notion that there is no room for drivers operating under the influence of a controlled substance, even as various US states and Canada continue their efforts to legalize marijuana. Any drug use by professional truck drivers or others in safety-sensitive functions poses a grave threat to all users of our nation's roadways, including our professional truck drivers. TCA continues to support the idea that hair follicle testing should become a viable alternative to urine-based drug testing nationwide. It remains committed to advocating for its acceptance into the Department of Transportation's drug testing protocols. Even more importantly, allowing the results of hair follicle testing to be incorporated into the Drug and Alcohol Clearinghouse should become mandatory to help

[3] Truck Parking Report, Trucker Path, July 2018.
[4] Staff, Women In Trucking. "Women in Trucking Association Releases 2023 WIT Index Data." Women In Trucking, 23 June 2023, www.womenintrucking.org/press-releases/women-in-trucking-association-releases-2023-wit-index-data.

curb the drivers that may have tested positive via hair testing yet obtain a job in our industry at another carrier that doesn't use this measure of drug detection.

Urinalysis testing has been the standard form of drug testing since its inception and certainly represents a simple and low-cost option for motor carriers across this country. However, hair follicle testing differs because people can't mask the results. Hair testing has several benefits, including the following:

- Extended detection window of up to 90 days
- In addition to evidence of drug use, it provides the frequency of drug use
- More challenging to manipulate
- Detects significantly more cocaine, opioids, amphetamines/methamphetamines, marijuana, ecstasy, and PCP

In a recent study involving seven large carriers who use hair follicle testing for their own driver screening purposes, in addition to urinalysis, the trucking companies examined the positive drug test results of both measures administered to over 88,000 drivers for pre-employment drug screening purposes. The results of the comparison are staggering. Of the 88,021 potential drivers who applied for jobs at these carriers, 403 drivers had tested positive for drugs with urinalysis. Conversely, 4,362 had tested positive for drugs using hair follicle testing, or almost eleven times the amount that tested positive with urine.[5] Even more alarming is that the hair follicle-positive test results were not placed into the Drug and Alcohol Clearinghouse, leaving nearly 4,000 drivers able to seek employment as professional truck drivers elsewhere, regardless of the positive hair test. As an industry, I can tell you, we can do better, we should do better, and accepting the results of hair follicle testing to the Drug and Alcohol Clearinghouse represents a measure that should not be denied any longer.

Of course, I make these statements at a time where marijuana, by far, has achieved the highest number of positive tests as reported by the Drug and Alcohol Clearinghouse since its inception on January 6th, 2020. Since then, there have been a total of 159,550 positive tests for marijuana recorded in the Clearinghouse, the number one substance by far. I mention this because, at this moment, the Drug Enforcement Agency is considering the notion of rescheduling marijuana from a Schedule I to a Schedule III narcotic. This move could exacerbate this issue, potentially leading to increased accidents on our highways.

A 2022 study found that the legalization of the recreational use of marijuana and the subsequent onset of retail sales in five states was, on average, associated with a 5.8% increase in injury crash rates and a 4.1% increase in fatal crash rates.[6] These statistics

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[5] Voss, Doug, and Joe Cangelosi. “COMPARING HAIR V. URINE TEST EFFECTIVENESS: TRUCKING ALLIANCE 2021 PRE-EMPLOYMENT DATA.” The Trucking Alliance, 2021.

[6] Charles M. Farmer, Samuel S. Monfort, and Amber N. Woods, (2022) “Changes in Traffic Crash Rates After Legalization of Marijuana: Results by Crash Severity," Journal of Studies on Alcohol and Drugs 83, no. 4

highlight the importance of maintaining stringent drug policies within the trucking industry. With the increased accessibility and acceptance of marijuana, there is a heightened risk of impaired driving, which can result in devastating consequences for road safety.

In addition, the absence of reliable technology to test if a driver is currently under the influence of marijuana, unlike alcohol, poses a significant challenge to maintaining road safety. While breathalyzers can accurately and quickly determine a driver's blood alcohol concentration, no comparable device exists for marijuana. Current drug tests can only detect the presence of marijuana in a person's metabolism, indicating past use but not current impairment. This inability to accurately measure real-time intoxication levels not only complicates the enforcement of zero-tolerance policies but also significantly increases the risk of impaired driving on our highways. TCA strongly urges the DEA and DOJ to consider the significant risks to road safety posed by rescheduling marijuana. Its current classification as a Schedule I drug helps to maintain the rigorous safety standards that are vital to the trucking industry.

Electrification

The Truckload Carriers Association (TCA) has made strides in advocating for reasonable timelines as a member of the Clean Freight Coalition. The truckload community is dedicated to reducing emissions and promoting environmental sustainability. However, there are concerns regarding the timeline for the EPA's ruling on "Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles, Phase 3." Additionally, we supported a letter, led by Senator Crapo and Representative Feenstra, urging the EPA to withdraw the heavy-duty truck emission rule during the last Congress. We are pleased to hear that under the new Administration the EPA is reconsidering the Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3 final rule and revisit portions of its nitrogen oxides (NOx) regulations.

Electric trucks make up only .01% of the commercial truck population, and their affordability, reliability, and achievability remain impractical for our nation's fleets.[7] Ryder Systems' recent study found that Battery Electric Vehicles could require nearly twice the equipment and labor compared to diesel counterparts, posing significant cost challenges.[8]

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[7] America's Truck and Bus Fleets Continue Turnover to Advanced Generation of near-Zero Emission Internal Combustion Engines." America's Truck and Bus Fleets Continue Turnover to Advanced Generation of Near-Zero Emission Internal Combustion Engines, Engine Technology System, 25 June 2024, https://enginetechforum.org/press-releases/posts/truck-and-bus-fleets-continue-turnover-to-advanced-gen-of-near-zero-emission-ice

[8] "Ryder System, Inc. - Ryder Examines Economic Impacts of Converting to Commercial Electric Vehicles (EV) in Current Market." Ryder Examines Economic Impacts of Converting to Commercial Electric Vehicles (EV) in Current Market, Ryder Systems, 8 May 2024, https://newsroom.ryder.com/news/news-

Meanwhile, 61% of commercial trucks newer than 2010 already feature advanced emissions control equipment, contributing to near-zero emissions. We believe viable alternatives, like renewable diesel, can make trucking more emissions-friendly without imposing unrealistic expectations.[9] Studies show that renewable diesel can reduce CO2 emissions by 67.3%, offering a practical solution that current fleets can adopt without modifications.[10]

Electric equipment's reliability remains a concern. Our members who have tested it report on issues regarding performance, reduced travel distances, and significant charging delays compared to diesel, all of which could impact our industry's flexibility and productivity.

The EPA Omnibus Rule regarding Nox regulations has also been a concern for our industry, as the rule presents significant feasibility, cost, and practical challenges.

As an association, we are deeply concerned about the mandated reduction to 0.035g/bhp-hr—an overall 99.3% reduction since 1998. This reduction, which many engine manufacturers are currently struggling to make, clearly indicates the technical challenges we face. The reliance on increased EGR and SCR, which present significant engineering challenges, further complicates the situation.

The rule's warranty provision is a point of contention, as it assumes that longer warranties will deter operators from disabling emissions systems on older trucks, with the idea that if emissions equipment remains under warranty, operators will be more likely to repair systems rather than tampering with or removing them. However, this overlooks the reality that extended warranties come at a significant cost to fleets and owner-operators. OEMs do not absorb these costs; rather, they pass them on to buyers in the form of higher vehicle prices. The additional expense, which could amount to thousands of dollars per truck, may not translate into meaningful emissions reductions, particularly in the near term. The effectiveness of this provision remains questionable, making it a policy that imposes financial strain without clear environmental benefits.

Another provision of the rule aims to address cold start emissions, which occur during the period between engine startup and the point at which the exhaust catalysts reach optimal operating temperature. The time required for the catalysts to reach efficiency depends on ambient temperature and engine workload. To accelerate this process, manufacturers are

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details/2024/Ryder-Examines-Economic-Impacts-of-Converting-to-Commercial-Electric-Vehicles-EV-in-Current-Market/default.aspx

[9] "America's Truck and Bus Fleets Continue Turnover to Advanced Generation of near-Zero Emission Internal Combustion Engines." America's Truck and Bus Fleets Continue Turnover to Advanced Generation of Near-Zero Emission Internal Combustion Engines, Engine Technology System, 25 June 2024,

[10] American Transportation Research Institute; April 2024. Comprehensive Truck Size and Weight Limits Study, Highway Safety and Truck Crash Comparative Analysis Technical Report. https://enginetechforum.org/press-releases/posts/truck-and-bus-fleets-continue-turnover-to-advanced-gen-of-near-zero-emission-ice

incorporating electric pre-heaters to warm the catalysts more quickly. However, these pre-heaters require a dedicated 48V alternator, adding substantial cost and complexity to vehicles. Given that this additional equipment is used only for a short duration until the catalysts reach their necessary temperature, the cost-benefit balance of this requirement is uncertain.

In all, we firmly believe the trucking industry will lead to America's clean energy future. However, this transition must be feasible for everyone involved. At a time when more questions surround this issue than plausible solutions, we remain skeptical about the timelines that have been incorporated into these regulations. The members of TCA are committed to ensuring a smooth and realistic shift that benefits both the industry and the environment; however, we must insist that any change in the improvement of our environmental impact be practical and realistically driven to succeed rather than destined to fail.

Safety Technology

Today's professional truck driver is a far different occupation than what it once was. Technology has embedded itself in the industry as a tool that continues to aid the safety performance of our driving population. The trucking industry invests $14 billion annually in technology, training, and other expenditures to improve highway safety. TCA has long supported technologies that reduce fatalities and the number of crashes on public roadways while continuously investing in driver safety performance, productivity and technology that has been determined to have a significant safety benefit. TCA has advocated for accident prevention technology and recognizes the role of the trucking industry in the nation's path to zero accidents. We remain committed to preventing accidents in their entirety.

Recent rulemaking from FMCSA continues to stress the importance of technology in helping drivers improve their safety performance. For example, Automatic Emergency Braking or AEB, coupled with Electronic Stability Control or ESC, is estimated to prevent 19,118 crashes, save 155 lives, and reduce 8,814 nonfatal injuries. Not only will installing AEBs and ESCs save lives, but they estimate that these devices eliminate 24,828 property damage-only vehicles (PDOV) accidents. In conjunction with NHTSA's Federal Motor Safety Standards: Automatic Emergency Braking Systems for Light Vehicles NPRM, NHTSA estimates that a single car with AEB technology would prevent a total of 362 fatalities and 24,321 nonfatal injuries during the vehicle's lifetime. The estimates for both NPRMs would save thousands of lives in years to come.

AEB is an additional layer of protection for truck drivers. It assists drivers in situations where they may not be able to react quickly, such as if a vehicle suddenly stops or slows

down in front of them. This can help prevent accidents caused by human error, fatigue, or distraction.

Even though AEBs and ESCs are reported to have 'false positives,' the TCA and its members still support technology that would lead to fewer road accidents to prevent crashes. Through interactions with our membership, we understand the presence of false positives is concerning. However, the drastic improvement in carrier safety performance highlights the need for this technology to become commonplace in our industry. As with any technology, we remain concerned over any expected timeframes in which AEB could be viewed as a perfect science. While this rulemaking would require AEBs to be placed on our equipment, we would be remiss if we did not insist that the trucking industry allow for a natural attrition of this technology to improve rather than a time-based deadline that could be difficult to achieve. We applaud NHTSA and FMCSA for continuing to investigate the cause of these failures as we continue to find ways to a zero-accident nation.

While technology in our industry goes a long way toward improving driver safety performance and preventing accidents, I would be remiss if I didn't mention the issue of Side Underride guards.

As a representative of an industry that extols the virtue of safety improvements, I am disappointed that bills regarding the mandate of Side Underride guards for all commercial vehicles have been introduced in both the House and the Senate that seemingly disregard the fact that we are here to prevent accidents from happening, not justify them. As equipment, they remain unproven and experimental and, if passed, would likely prevent motor carriers from investing in actual technology that could stop accidents from ever happening.

Our nation's needs are expressed by the flexibility that trucking employs. Equipment such as Side Underride guards have demonstrated that they do not adhere to the variety of trailers that exist to pacify the needs of a nation. The bill raises significant operational issues related to ground clearance, sliding tandem rear axles, and the diversity of truck and trailer designs. For example, as flatbed trailers are naturally curved to suppress the loaded weight, they may not be able to accommodate this specific equipment; and these questions can be asked for intermodal trailers, tank trailers or even heavy haul. Trucking should not be viewed as a one-size-fits-all environment, and previous legislation, such as the Stop Underrides Act, does precisely that.

As an industry, we cannot direct our safety investments toward technology that mitigates a crash after it happens when the opportunity is before us, as an industry. As a Congress, you should encourage investment in technology that stops accidents from happening in the first place. This is what the future of safety technology brings about, and it makes the promise of a "Road to Zero", a realistic premise for FMCSA, NHTSA, and FHWA, which seek to achieve zero deaths within the next 30 years.

Autonomous Vehicles

As an association, we recognize that technology in the trucking industry continues to evolve, but it is far from perfect. Level 4 and Level 5 Autonomous Vehicles (AVs) fall squarely into this category, as they are still in the development and testing phases, with significant challenges to overcome before widespread deployment.

Currently, AVs are hauling freight with autonomous technology in control, but a human driver remains in the cab as a safeguard. This ensures that a trained professional is available to intervene if necessary, addressing any system failures, road hazards, or unexpected conditions that AV technology may not yet be equipped to handle.

Recently, there have been discussions about removing the human driver entirely in certain regions, mainly for short-haul routes in Texas. While this represents a potential step toward fully autonomous freight movement, hurdles remain before such operations can be safely implemented on a larger scale. One critical challenge involves compliance with federal and state safety regulations, specifically, the placement of orange warning triangles when a truck is pulled over on the side of the road.

Under current regulations, when a commercial motor vehicle experiences a breakdown or must pull over, the driver must manually place reflective triangles on the ground to alert other motorists. This is a critical safety measure to prevent collisions, particularly in low-visibility conditions. However, AV technology does not currently possess the capability to exit the cab and perform this task, presenting a significant operational gap. Without a human presence, alternative solutions, such as automated deployment systems or legislative changes to accommodate AV-specific safety protocols, must be explored and tested extensively before AVs can operate without human oversight.

As we evaluate the role of autonomous technology in the trucking industry, we must ensure that safety remains a top priority. While advancements in AVs hold great potential for efficiency and cost savings, the industry must address critical gaps before considering removing human drivers from the equation. Robust testing, regulatory adaptations, and industry collaboration will be key to bridging these gaps and ensuring that technology enhances rather than compromising highway safety.

Lawsuit Abuse

It is a fair transition from safety technologies to one of the major threats against a trucking company operating on our roads today. Lawsuits resulting in exorbitant penalties continue to plague the industry. Numerous states have either passed or considered bills to help address the problem, with varying degrees of success. The reality is that, unfortunately, accidents happen; as much as we invest in technology to prevent them, at times, people can be seriously or fatally injured. When this happens, our legal system allows the injured

party to seek recovery and/or damages from the party responsible for the accident. This is a good thing, and it is what we purchase insurance for; however, the opposition from plaintiff attorneys continues to be our biggest hurdle in achieving true legal reform.

Have you noticed the TV commercials and billboard advertisements from personal injury attorneys targeting "big truck accidents"? You can't miss them; they are everywhere. It is big business and has become a specialty industry. The plaintiffs' bar is highly organized and very good at what it does.

I am not saying personal injury attorneys are bad people, but they target significant cases involving trucking companies with lots of insurance and/or assets. They game the legal system, disparaging our industry and convincing juries that truckers are bad actors who need to be punished. Some might be, but not even that justifies the lottery jackpot verdicts and settlements that have dramatically increased over the last 10 years.

Jury awards have become so large that they have investors who now finance the cost of multi-year litigation for big returns on their investment. They venue-shop for states with favorable judicial procedures, precedents, and big-verdict judgments that do not have noneconomic damage limits.

This nation and industry need litigation reform in the worst way. Runaway "jackpot justice" must be throttled back. Hundreds of thousands of trucking companies that move America's freight are paying higher insurance premiums today because of it.

Progress is being made in several states, but we have a long way to go. We are going to be able to overcome the plaintiff's bar. In that case, we will need the public to support our efforts by talking to legislators and voting on litigation reform initiatives. There is hope. Since our industry is critical to the nation's supply chain, we are regulated by the federal government. That knowledge alone should allow our industry to be adjudicated in the federal court system.

With that in mind, I must urge Congress to support the Highway Accident Fairness Act of 2023, a proposal to make staging a collision with a commercial motor vehicle a federal crime and modify legal procedures for suits arising from commercial motor vehicle accidents. The bill would also grant federal courts jurisdiction over such action in some instances where damages exceed $5 million.

CDL Wait times/Flexibility

As a result of that competency-based training, potential drivers must begin testing to ensure their training has taken hold. TCA supports CDL testing flexibility to support our nation's supply chain and increase the window of opportunity for potential drivers to begin their careers. However, we must stress that the federal government should require states to adopt a reflective national standard across all 50 states. The CDL examination, as it appears today, can differ depending on the state where the test is conducted. The

difference in state requirements for obtaining a CDL is a crucial factor to consider. Each state develops its own CDL testing standards, which may differ in stringency. Allowing drivers to get their CDL in a state with less stringent requirements could compromise safety, as drivers may not be adequately prepared for the responsibilities of commercial driving.

Additionally, we always remain concerned about the time it takes for a potential driver to take the CDL exam. Reducing the wait time for a CDL examination can be critical for a potential driver obtaining a career in trucking. Suppose the waiting time between finishing training and sitting for the exam is lengthy. In that case, students may be able to obtain a job in another field, thus never embarking on a rewarding career in an industry that needs them. Demand for professional drivers continues to grow, recently it was reported that over 78,000 driving positions remained unfilled. If these trends continue, industry experts predict that the number of unfilled positions could exceed 170,000 by 2030. With those factors in mind, TCA supports CDL testing flexibility as it will support our nation's supply chain and lessen its driver shortage. However, as mentioned above, each state develops its own CDL testing standards, which may be challenging to control as we are a nation of 50 states. We strongly suggest that the federal government consider one federal standard for CDL testing so drivers can adhere to universal regulations. The professional truck driver today is the safest, most well-trained driver on the road; if CDL testing flexibility occurs, each state must have the same guidelines to help ensure drivers meet consistent, high standards regardless of where they test.

Young Drivers

TCA strongly supports the 18–20-year-old pilot apprenticeship initiative and is proud to be a registered apprenticeship sponsor. FMCSA's efforts to expand its research on younger commercial drivers are essential to addressing the industry's workforce challenges.

These pilot programs will provide a structured pathway for young drivers to safely enter the trucking profession, allowing them to operate in interstate commerce under comprehensive training and supervision. TCA has long advocated for policies like the DRIVE-Safe Act, which aligns with this initiative, and we look forward to its reintroduction in Congress.

Cargo Theft

Cargo theft is a silent issue that many in the trucking industry hesitate to discuss openly. Still, it's one that many of our carrier members are dealing with daily. According to Verisk CargoNet, 2024 marked a record-breaking surge in cargo theft, with incidents rising by 27% year over year across North America. In total, 3,625 cargo thefts were reported, the highest

number ever recorded.[11] States like California, Texas, and Illinois have seen the most frequent cargo theft incidents, which speaks to the growing problem affecting our industry.

What makes this issue even more concerning is the calculated methods criminals use to steal cargo. These thieves have become increasingly sophisticated, with tactics such as freight fraud, where they pose as reputable carriers or create fake trucking companies. They forge documents and even coordinate thefts remotely, making it harder for carriers to prevent or trace these crimes.

For many carrier members, including myself, these thefts are specifically targeted. The stolen freight is always high-value, which indicates that these criminals are well aware of the products they're taking. One carrier shared a particularly striking example: the theft of Jack Daniel's whiskey and Hershey's chocolate, two products with significant market value. This brings me to another critical point: cargo theft is not just a problem for the trucking industry but also driving up consumer prices. The average value of a stolen shipment has risen dramatically, with some shipments now worth over $200,000.[12]

To address this growing issue, we need more proactive measures, and that's why the support of legislation like the Cargo Theft Safeguarding Our Supply Chains Act, which was introduced in the last Congress, is crucial. This bill aims to strengthen efforts to combat cargo theft by enhancing penalties for criminals, improving coordination between law enforcement agencies, and providing better tools for tracking stolen goods. By supporting this legislation, we can take meaningful steps to protect both our carriers and the consumers who ultimately feel the effects of this crime.

Increased Truck Size

As a member of TCA, I have serious concerns about the widespread adoption of Twin 33-foot trailers and the risks they pose to safety, infrastructure, and the trucking industry as a whole.

The issue of Twin 33-foot trailers is one of the most divisive topics in the trucking industry, and there is no clear consensus on where we stand. But one thing is certain: safety remains a significant concern.

Drivers often call Twin 33s "wiggle wagons" because of their instability, and for good reason. Studies show these configurations have an estimated 11% higher fatal accident involvement rate. The US Department of Transportation (USDOT) has also found that Twin

[11] "Cargo Theft in Trucking Hits Record High in 2024." TruckersReport.Com, Truckers Report, 4 Feb. 2025, www.thetruckersreport.com/news/cargo-theft-trucking-hits-record-high-2024/.
[12] "Ibid"

33s need an extra twenty-two feet to come to a complete stop compared to the Double 28s currently in use.[13] That's a big difference, especially in emergencies.

Beyond that, the process of coupling and uncoupling Twin 33s puts drivers at risk of injury. It is a physically demanding task that increases the likelihood of accidents on the job. In adverse weather, these trailers do not perform reliably, making dangerous conditions even worse.

With so many safety concerns in play, it is easy to see why this issue remains controversial. However, safety is not the only challenge; Twin 33s also bring carriers significant financial and operational hurdles. For one, transitioning to Twin 33s would have a hefty price tag. Replacing entire fleets to meet shipper demand is not a small investment, and many companies simply could not afford it. Those who cannot make the shift risk being left behind, creating an uneven playing field in the industry.

Then there is the driver shortage. Twin 33s require a unique doubles/triples CDL endorsement, and with qualified drivers already in short supply, this would only make hiring even more difficult. On top of that, the trucking industry is already struggling with a severe parking shortage. Longer trailers would take up even more space, making it harder for drivers to find safe resting places.

Infrastructure would also suffer if Twin 33s became the norm. Studies estimate that these configurations would increase pavement damage by 1.8% to 2.7%,[14] adding up to an extra $1.2 billion to $1.8 billion in roadway repair costs every year.[15] That is a massive burden on an already strained infrastructure system.

In addition, double-trailer configurations have a 58% higher out-of-service rate compared to single-trailer trucks.[16] According to the Insurance Institute for Highway Safety (IIHS), trucks with any out-of-service violations are 362% more likely to be involved in a crash.[17] That raises serious concerns about the safety and reliability of Twin 33s on the road.

When you add up safety risks, financial burdens, operational challenges, and infrastructure damage, it is clear that Twin 33s create more problems than solutions. Instead of pushing

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[13] Comprehensive Truck Size and Weight Limits Study, Highway Safety and Truck Crash Comparative Analysis Technical Report USDOT; 2015.
[14] Comprehensive Truck Size and Weight Limits Study, Highway Safety and Truck Crash Comparative Analysis Technical Report USDOT; 2015.
[15] R.D. Mingo and Associates; 2015. Analysis of 2012 FHWA Highway Statistics and selected Cost Allocation studies.
[16] Comprehensive Truck Size and Weight Limits Study, Highway Safety and Truck Crash Comparative Analysis Technical Report USDOT; 2015.
[17] Insurance Institute for Highway Safety; 2016. Crash Risk Factors for Interstate Large Trucks in North Carolina.

for longer trailers, we should focus on policies that enhance safety, improve efficiency, and support the drivers who keep our industry moving.

Increased Truck Weight

Congress has consistently rejected any increase in national truck weight limits due to concerns over public safety and infrastructure damage. In 2015, the House voted bipartisan to maintain the federal weight limits.[18] However, in recent years, legislation has been introduced to increase truck weight limits.

Like the push for more extended truck configurations, TCA is vehemently opposed to any effort to increase truck weight limits from 80,000 lbs. with five axles to 91,000 lbs. or 97,000 lbs. with six axles—and for good reason.

First, retrofitting existing trucks or adding a new trailer to accommodate the extra axle would impose a significant financial burden on carriers. Many carriers cannot afford the upgrades, and shippers will not be willing to pay the additional fees to haul heavier loads.

There is also the impact on infrastructure. The added axle would increase emissions and strain our already overloaded infrastructure. USDOT estimates that the 91,000-pound, six-axle configuration would negatively impact more than 4,800 bridges, costing an estimated $1.1 billion to repair. A recent report also found that over 72,000 local bridges that USDOT did not examine are not rated to handle 91,000-pound trucks safely. Replacing these bridges would cost a staggering $60.8 billion, and taxpayers would be left with the bill.[19]

Safety is another significant concern when it comes to increasing truck weight limits. A 2016 USDOT study showed that heavier six-axle trucks, specifically those weighing 91,000 and 97,000 pounds, are involved in more crashes than their lighter counterparts. In states where sufficient data was available, the findings were troubling. In Washington state, six-axle trucks weighing up to 91,000 pounds had a 47% higher crash rate than other trucks. The situation was even worse in Idaho, with crash rates for six-axle trucks up to 97,000 pounds nearly doubling, an alarming 99% increase. In my state of Michigan, the crash rate was shockingly higher, with six-axle trucks up to 97,000 pounds involved in 400% more crashes than other vehicles.[20] These statistics highlight the potential dangers of heavier trucks on the road, putting drivers and the public at risk. With such staggering numbers, it is clear that the safety of both drivers and motorists could be severely compromised by allowing heavier trucks.

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[18] On Nov. 3, 2015, an amendment offered by Rep. Reid Ribble (R-Wis.) to the Transportation Reauthorization Act was defeated on a bipartisan vote, 236 to 187.

[19] Bailey, Harvill et al; 2023. The Impacts of Heavier Trucks on Local Bridges

[20] Comprehensive Truck Size and Weight Limits Study, Final Report to Congress, USDOT; 2016.

In Conclusion

I am grateful for the opportunity to testify before you today on behalf of the Truckload Carriers Association, Load One, and the millions of Americans who seek to make trucking a career choice and the millions more who already have.

I look forward to working with Chairman Rouzer and the other Members of the Subcommittee to support efforts to meet those challenges. Thank you.