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***Driving Trucking's Success***

Bill Graves
President and Chief Executive Officer

August 30, 2006

Mr. John Hill
Administrator
Federal Motor Carrier Safety Administration
400 7th Street, SW
Washington, DC 20590

Dear Administrator Hill,

The American Trucking Associations (ATA) supports the safety goals associated with the "Petition for Rulemaking to Compel Electronic Governed Speed not to Exceed 68 MPH on Class 7 and 8 Commercial Motor Vehicles" filed today by a number of ATA-member motor carriers. Based on the available research in this area, ATA believes that limiting the speed of commercial trucks will have a significant, positive impact on the safety of commercial vehicles.

According to the Federal Motor Carrier Safety Administration's (FMCSA) *Large Truck Crash Facts 2004*, driving too fast for conditions or in excess of posted speed limits by the truck driver were factors in 14 percent of single-vehicle crashes and seven percent of multiple-vehicle crashes that resulted in a fatality. FMCSA's *Large Truck Crash Causation Study* found that in crashes where trucks were assigned the critical reason for the crash, "Traveling too fast for conditions" was cited as the critical pre-crash event 18 percent of the time. This was the single most frequently cited factor in crashes where trucks were assigned a critical reason.

The relationship between vehicle speed and crash severity is also well-documented. According to the Federal Highway Administration's *Synthesis of Safety Research Related to Speed and Speed Limits* (1998), the more kinetic energy to be dissipated in a collision, the greater the potential for injury to vehicle occupants. The kinetic energy of a moving vehicle is a function of its mass and velocity squared. Because kinetic energy is determined by the square of the vehicle's speed, rather than by speed alone, the probability of injury, and the severity of injuries that occur in a crash, increase exponentially with vehicle speed. For example, according to the synthesis, a 30 percent increase in speed results in a 69 percent increase in the kinetic energy of a vehicle.

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ATA's Board of Directors recently adopted a new safety policy supporting a mandatory 68 MPH setting for the electronic speed governor of class 7 and 8 commercial motor vehicles. One notable aspect of ATA's policy is that it supports a prospective regulation which applies only to newly manufactured vehicles. Therefore, while ATA encourages FMCSA to evaluate the merits of governing truck speed, per our current policy, ATA urges FMCSA to coordinate any rulemaking on this subject with the National Highway Traffic Safety Administration to ensure that it applies to newly manufactured large trucks and to ensure that these trucks are equipped, at the time of manufacture, with hardened, tamperproof governors.

We look forward to expeditious Department action on this important safety issue.

Sincerely,

Bill Graves

CC: Nicole Nason, Administrator, NHTSA