



## Owner-Operator Independent Drivers Association

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Representative Dennis Johnson  
Chairman  
Interim Agriculture & Transportation Committee  
North Dakota House of Representatives  
4518 Highway 20 South  
Devils Lake, ND 58301-8518

Via e-mail: [djohnson@nd.gov](mailto:djohnson@nd.gov)

Dear Chairman Johnson,

The Owner-Operator Independent Drivers Association (OOIDA), which represents over 550 owner-operators and professional truck drivers in North Dakota, and over 150,000 drivers nationwide, is concerned about proposals that would allow for bigger trucks, specifically “road trains,” to operate in North Dakota and surrounding states. We are opposed to legislation that would give the Governor nearly unlimited authority to allow truck combinations of 200 feet or more to operate within the state as well as requests to Congress to allow bigger trucks to operate on the National Network in the region.

OOIDA has consistently opposed efforts to increase the size and weight of commercial motor vehicles (CMVs) on our nation’s roadways. Increasing the size and weight of CMVs would reduce safety margins and adversely impact small trucking businesses, which constitute a large and critical segment of the American trucking industry. We also reject any notion that there is a shortage of truck drivers, and proposed solutions to address this non-existent problem would only make the trucking industry less attractive for small-business truckers and professional drivers.

Allowing longer combination trailers would only benefit a handful of large or specialized motor carriers, while damaging the rest of the trucking industry. Permitting trucks to operate in larger combinations would have immediate economic implications for small trucking businesses, who would be pressured to increase their hauling capacity just to stay competitive. Unlike specialized or large carriers, who either possess the necessary equipment or could transition their fleets over time while maintaining business, smaller trucking companies and owner-operators would be forced to immediately modify their equipment at great cost just to remain viable. Unfortunately, previous weight and length configuration increases have demonstrated bigger trucks don’t lead to higher paychecks for professional drivers.

We also believe that any allowances for larger combination vehicles are the first step down a slippery slope to increasing operating weights and sizes for other industries and regions. We have seen this play out in other states, where special interests have pointed to existing exemptions to secure favorable treatment for their own industry. For example, Pennsylvania has enacted 20 exemptions over the last 25 years for specific industries

and commodities. This proliferation of exemptions only benefits certain industries, and leads to even greater confusion between regions and states, undermining any efforts to create consistency.

We are also concerned about the infrastructure costs associated with larger and heavier trucks. Previous U.S. Department of Transportation (DOT) studies have found increased road damage from these trucks, and in particular, increased bridge damage.<sup>1</sup> Allowing for bigger trucks to operate on the National Network will push the repair costs for this increased damage onto all truckers and motorists, the vast majority of whom will not benefit from these exemptions. Larger combination vehicles also create safety hazards. The DOT's previous study also found increased crash rates for heavier and larger combination vehicles.<sup>2</sup>

Finally, and most importantly, this proposal should not be pursued to address any alleged "driver shortage." Contrary to what is repeated constantly, there is no shortage of drivers or CDL-holders. The notion of a driver shortage is not supported by facts, data, or reputable research. Instead, there is a shortage of decent pay and satisfactory working conditions for drivers that generates exceedingly high levels of turnover within the industry and ultimately forces many truckers away.

Evidence from multiple federal agencies helps to dispel this myth. By the Federal Motor Carrier Safety Administration's estimates, there are over 400,000 new CDLs issued annually, which shows there is certainly no shortage of new entrants to the industry.<sup>3</sup> Additionally, a 2019 analysis from the Bureau of Labor Statistics found the labor market for truckers is similar to that of other blue-collar professions, and that while there is certainly a high rate of turnover in some parts of the trucking industry, there doesn't appear to be evidence of a shortage.<sup>4</sup>

Even the American Trucking Associations (ATA), the foremost purveyor of the driver shortage myth, has only claimed that there may be a shortage of 160,000 drivers by 2028. We have seen no evidence to support the claim that our nation faces a shortage of 900,000 drivers, as stated in ND Resolution D-3005.

In conclusion, OOIDA firmly opposes any efforts to increase weight or size limits for CMVs, whether on state roads or regional highways on the National Network. These changes would harm, not help, small-business truckers.

Thank you,



Lewie Pugh  
Executive Vice President  
Owner-Operator Independent Drivers Association, Inc.

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<sup>1</sup> U.S. DOT, Comprehensive Truck Size and Weight Limits Study, Vol. 1: Technical Reports Summary, [https://ops.fhwa.dot.gov/freight/sw/map21tswstudy/technical\\_rpts/vol1technicalsummary.pdf](https://ops.fhwa.dot.gov/freight/sw/map21tswstudy/technical_rpts/vol1technicalsummary.pdf)

<sup>2</sup> Ibid.

<sup>3</sup> FMCSA, Regulatory Evaluation of Entry-Level Driver Training Notice of Proposed Rulemaking Regulatory Impact Analysis Initial Regulatory Flexibility Analysis (March 2016).

<sup>4</sup> Bureau of Labor Statistics, Monthly Labor Review, *Is the U.S. labor market for truck drivers broken?* (March 2019).