



**Owner-Operator Independent Drivers Association**

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October 28, 2021

The Honorable Chris Murphy  
U.S. Senator  
136 Hart Senate Office Building  
Washington, DC 20515

The Honorable Cory Booker  
U.S. Senator  
717 Hart Senate Office Building  
Washington, DC 20515

The Honorable Richard Blumenthal  
U.S. Senator  
706 Hart Senate Office Building  
Washington, DC 20515

Dear Senators Murphy, Blumenthal, and Booker,

We write in response to your October 21 letter to President Biden regarding nitrogen oxide (NO<sub>x</sub>) standards for on-road diesel trucks.

Clean air is a priority for everyone, including truckers, but the technology used in heavy-duty trucks to improve air quality has to be affordable and reliable. During previous emissions rulemakings, owner-operators were forced to use unproven technologies that priced them out of business. Any updates to NO<sub>x</sub> standards must result in practical, cost-effective standards that do not unfairly burden professional truckers.

In recent years, the trucking industry has been subjected to numerous federal and state regulations relating to environmental emissions. While some of these standards were necessary and helpful in reducing vehicle emissions, many were short-sighted and have been difficult to implement, especially for smaller motor carriers. The influx of regulations has contributed to higher costs for new trucks with the average price increasing almost 44 percent since 2008.<sup>1</sup>

In some cases, these dramatic cost increases can limit the environmental benefits of the regulations by forcing truckers to maintain older vehicles longer than they otherwise would. On average, OOIDA members have stated that emissions and environmental equipment represented approximately \$3,000 of their annual maintenance costs.<sup>2</sup> In past surveys, 59 percent of OOIDA members have indicated they did not get a return on investment for installing and using environmental/emissions technologies such as exhaust gas recirculation (EGR) / selective

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<sup>1</sup> *Owner-Operator Member Profile Survey 2018*, OOIDA Foundation (2018).

<sup>2</sup> *Ibid.*

catalytic reduction (SCR) systems and diesel particulate filters (DPF).<sup>3</sup> For small carriers operating on extremely slim margins, these high costs for purchase and maintenance can be a major deterrent to purchasing newer, cleaner trucks.

We have seen the pitfalls of requiring increasingly complex technology for heavy-duty vehicles during the current supply chain crisis. As more components and technologies are added to trucks to comply with environmental mandates, there is an increase in the maintenance and repairs that must be done. And when components fail, they must be replaced before a truck can be placed back in operation.

Recently, there has been a shortage of diesel exhaust fluid (DEF) sensors. Because of supply chain problems, truckers have been unable to obtain these parts, and their trucks have been sidelined. Small-business truckers have been disproportionately harmed by this shortage because, unlike larger carriers, they don't have extra trucks to operate. Many of them are single-truck operations, which means they are unable to continue working and earning money. Trucks being forced out of service has further exacerbated supply chain problems.

We also take issue with your assertion that, "California has already shown that a 90% increase in stringency beyond current national diesel engine emission standards is technologically feasible." While it may be true that it is physically possible to meet California's new standards, we have seen some small-business truckers leave the California market because the state's emissions requirements are simply unaffordable.

Small-business truckers make up 96% of registered motor carriers, and their continued viability is necessary to the health of our economy. Experience has shown that these standards are **not** feasible for many of these hard-working Americans, and Congress cannot ignore these problems. Without listening to these drivers and understanding the challenges they face in complying with government mandates, you risk putting them out of business and making the profession unattainable for future generations.

Thank you,



Todd Spencer  
President & CEO  
Owner-Operator Independent Drivers Association, Inc.

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<sup>3</sup> *Owner-Operator Member Profile Survey 2014*, OOIDA Foundation (2014).