If, with the new and additional economic factors, sufficient facts are not available for application of the above principle, then action on this bill should be withheld pending requisite study.

I respectfully ask that this letter and the attached statement be made a part

of the record of hearing before your Committee on S. 2658.

Sincerely.

THOMAS M. GOODFELLOW.

STATEMENT OF THE ASSOCIATION OF AMERICAN RAILROADS BEFORE THE SUBCOM-MITTEE ON ROADS OF THE HOUSE COMMITTEE ON PUBLIC WORKS WITH RESPECT TO

The American railroads are strongly opposed to enactment of S. 2658 at this time. In our opinion, any favorable action on the bill would be premature and ill advised. The reasons for this opinion embrace the interests of our industry and of the general public—and in most respects we find those interests to be largely common. Briefly stated, those reasons are:

1. Our national transportation policy demands that the presently existing inequitable situation as between motor carriers and railroads, as well as between the various classes of highway users, must not be aggravated or worsened. S.

2658 would do exactly that.

2. While safe operation on the highway is the direct concern of its users, the railroads have a direct interest in the proper assignment of cost burden re-

quired by those considerations.² S. 2658 contains no such provision.

3. The motor vehicle weights and sizes permitted under S. 2658 exceed those which, after comprehensive study, have been recommended to and adopted by the Congress. Without further economic study, action permitting such excess would be premature.

4. Without comprehensive study of what will be required in the interest of safe operation on the highways and assignment of cost responsibility therefor, passage of S. 2658 would certainly be untimely.

There follows a discussion of each of the foregoing reasons for our opposition

Briefly, this bill would accomplish the following:

- (A) Weight on a single axle increased to 20,000 lbs. (presently set by law at 18,000 lbs. on Interstate System)
- (B) Weight on a tandem axle increased to 34,000 lbs. (presently set by law at 32,000 lbs. on Interstate System)
 (C) Vehicle width of 102" plus additional width for safety devices and

tire bulge. (presently set by law at 96" on Interstate System)

(D) Overall vehicle gross weight without a maximum, weight calculated

- by a formula based on the number and spacing of axles. (presently set by law at 73,280 lbs. on the Interstate System)
- (E) No overall length limits of vehicle combinations. (present efficient length controlled by gross vehicle maximum of 73,280 lbs, on the Interstate

These sizes and weights are to be the maximum allowed on the Interstate System with the States to set their own standards within the Federal limits. Incidentally, there is no practical way to confine such vehicles to the Interstate System. Some States in 1956 retained maximum weights in excess of Federal standards at the time of passage of the Act by special provisions of the law.

This bill will do much more, both specifically and in broad economic effects, than the above specifications would indicate. The vehicle dimensions asked for exceed the recommended sizes and weights developed by any current valid study, including that study authorized by the Congress in establishing the Interstate System. Further, these dimensions carry *none* of the safeguards, either as to financing or safety of operation, recommended to the Congress in the same study.

THE NATIONAL TRANSPORTATION POLICY DEMANDS THAT THE PRESENTLY EXISTING INEQUITABLE SITUATION NOT BE AGGRAVATED OR WORSENED

We do not have to remind this Committee that the Congress, in 1940, by the passage of the National Transportation Policy, prescribed for the future policies

¹ Appendix, p. 713. ² Appendix, p. 713.