

establishment of definitive limits. That research has been carried out and recommendations have been based on it.

The grandfather clause is illogical on its face. If it is retained, however, proper user charges should of course reflect the higher levels of use that would be permitted and the even higher levels of highway construction and maintenance costs that would result in the states that could take advantage of the grandfather clause.

COMPREHENSIVE STUDY OF ECONOMIC AND SAFETY FACTORS INHERENT IN THE PROPOSALS OF S. 2658 MUST PRECEDE ANY ACTION THEREON

The measure before you would increase the single-axle load of the heavy vehicle from 18,000 pounds to 20,000 pounds; increase the tandem-axle load from 32,000 pounds to 34,000 pounds; increase width from 96 inches to 102 inches. No limitation would be placed on either length or height of vehicles.

The proposals incorporated in S. 2658 exceed those of the 1946 policy of the American Association of State Highway Officials; of the 1964 policy of the American Association of State Highway Officials; of the 1964 Report of the Bureau of Public Roads to the Secretary of Commerce and of the 1964 Report by the Secretary of Commerce to the Congress.

The 1956 Federal Highway Act contained two very important sections relative to this subject. One, Congress instructed the Secretary of Commerce to "take all action possible to expedite the conduct of a series of tests now planned, or being conducted, by the Highway Research Board of the National Academy of Sciences, in cooperation with the Bureau of Public Roads and the several States, and other persons and organizations, for the purpose of determining the maximum desirable dimensions and weights of vehicles operated on the Federal-Aid Highway System, including the Interstate System, and after the conclusion of such tests, but not later than March 1, 1959, to make recommendations to the Congress with respect to such maximum desirable dimensions and weights."

The second important section was "Section 210," which ordered the Secretary of Commerce "to make available to the Congress information on the basis of which it may determine what taxes should be imposed by the United States, and in what amounts, in order to insure, insofar as practicable, an equitable distribution of the tax burden, among the various classes of persons using the Federal-Aid Highways or otherwise deriving benefits from such highways."

These studies and reports by the Bureau of Public Roads, acting under the Secretary of Commerce, were ordered by the Congress of the United States. The report on maximum desirable dimensions and weights of vehicles operated on the Federal-Aid Systems was submitted to the Congress on August 19, 1964, by the Secretary of Commerce, as House Document No. 354 of the 88th Congress, 2nd Session. That report, as submitted to Congress, did not follow, in a number of respects, the report submitted to the Secretary of Commerce by the Bureau of Public Roads. The Bureau's recommendations, for axle loads, gross loads and vehicle width, were increased in the Office of the Secretary of Commerce before the report was submitted to the Congress.

The Highway Cost Allocation Study, identified as "Section 210" was submitted in two documents, i.e., "Final Report of the Highway Cost Allocation Study," House Document No. 54 of the 87th Congress, 1st Session, dated January 6, 1961, and "Supplementary Report of the Highway Cost Allocation Study," House Document No. 124, 89th Congress, 1st Session dated March 24, 1965.

The Bureau of Public Roads, working with its own staff, in cooperation with the State Highway Departments and other interested groups, did comply with the mandate of the Congress and did submit to you reports which you ordered. The Road Test at Ottawa, Illinois, which extended over a period from 1956 to 1962, was the most elaborate, refined and scientific undertaking of its kind ever made. The total cost was in excess of \$27 million. The magnitude of this undertaking can be measured by the fact that Defense Department military personnel, acting as drivers, drove 120 trucks over the test road 17½ million miles between the dates of November 5, 1958 and November 30, 1960.

Based on those prolonged studies, the Bureau of Public Roads, in consultation with the State Highway Departments, made certain basic recommendations.

S. 2658 would provide single-axle limitations of 20,000 pounds; tandem-axle limitations of 34,000 pounds, widths of 102 inches; no length limitations and no height limitations. The procedures for determining gross loads indicate that 9-axle vehicles of 98-foot length would be permitted to carry gross loads of ap-