

understanding in the colloquy that should have been provided for in the Committee. In response to that need, let me comment briefly to some of the answers to the questions that I had presented to the American Trucking Associations, Inc. and their answers.

A further answer to the figures quoted in response to question 2 should reveal that the West is already hauling more tonnage than the East and so the question is raised, "Why do they feel, if they actually do, a disadvantage?"

Also, it should be noted that Table HT-206 on page 48 of the Highway Statistics Summary it shows that since 1941 trucks operating in the Mountain and Pacific division have consistently carried heavier loads than any other census division. It should be noted that we don't mean ton miles, but average loads.

A further observation on question 5 in addition to the answer given by the truckers there should be given special note that in 1966 about 1% of trucks were livestock carriers including the drop-frame type mentioned (1,236 units out of a total 113,542 was the figure noted on page 17 in the 1967 edition of *Motor Truck Facts*). If this 1% is representative of 1966 information data for 1966 then there are perhaps 14,400 livestock trailers in the United States and some unknown but smaller number are the "possum belly" type.

In answer to question 9, I would like to make this addendum to the answer given by the truckers and it is this. Interstate roads are designed for 18,000-32,000 and so are the bridges so the logical question is: How can we match road and weight if there is constant agitation to change vehicle size and weight? Is not the logical conclusion that we need federal ceilings?

As further note on question 7, I ask all interested parties to see pages 81, 161 and 162 of House Document 354, 88th Congress, 2nd session, which shows a \$72 reduction in truck operating cost for every \$1 invested in highway construction. This is on the 20,000-36,000 weight, and I think it is logical to conclude that it would be less on 20,000-34,000, but still substantial.

There might be a misunderstanding from the answer given to question 13 so I would like to make this addendum. Section 127 of Title 23 says "96 inches" period. There are no exclusions in Title 23 as I understand it. It could be that the states permit them but if so, they are in violation of federal statute.

A question that occurs to me on question 15 is this. In answer to question 14 the respondent had no knowledge of any relationship between rate reduction and adjustments in gross weights. (How then can increase in payload made possible by adjustment in gross weights be held out as potential savings?).

On question 17, I should like to observe that additional tests will always be needed. AASHO tests only establish the base line. Climate conditions and topographical and geographical conditions in different areas of the country have to be used to apply to local conditions. (See page 61 of House Document 354.)

I should like to comment further on paragraph 5 in answer to question 17 by saying that I would hope that we apparently have not wasted \$27 million of highway trust money since the determination of desirably dimensions and weights was its major purpose of Section 108(k) of the Federal Aid Highway Act of 1956 and the AASHO test (not only for interstate, but all federal aid highways). Further, I would hope that the trucking industry is not assuming the position of challenging the validity of AASHO road tests which involved the best engineers and research minds in the country and I would hope that they would not suggest in offering no substitute data that the weight of a truck has no relationship to pavement damage or pavement life.

In answer to question 19 I think it should be pointed out that paragraph 5 of the answer may be wrong and should be challenged. (To verify this I asked that you turn to page 1 of Ward Goodman's statement before House Roads Subcommittee dated May 28, 1968. See also page 14).

A further comment on answer to question 24. This is one of the most important questions and I am happy to note that the industry would not have strong attitudes about this one way or another. If we should decide that the 20,000-34,000 limitations are right and reasonable for the best of our highways, the interstate system, they ought not be exceeded on *any* federal highway system.

On safety I am willing to accept the American Trucking Associations, Inc. statement on the safety record rather than that presented by other testimony and I think it fair to add that the record as claimed by the industry is not a good one and I think it is fair to conclude also by the increasing of width, length and weight as proposed will not add to the prospect for improvement of the safety record.