



April 24, 2019

Honorable Karen Spilka, Senate President
Office of the Senate President
State House, Room 332
Boston, Massachusetts 02133

Dear Senate President Spilka,

On behalf of the over 250 trucking companies of the Trucking Association of Massachusetts (“TAM”) and the thousands of trucking company employees who transport goods throughout the Commonwealth, I am writing in opposition to Amendment #3 to Senate Bill 2204, An Act to Reduce Traffic Fatalities. The inclusion of back-up cameras on certain types of trucks and trailers is not necessarily shown to improve safety, notwithstanding the unknown cost and practical difficulties of implementing this technology on entire truck fleets that may be contracted with the Commonwealth.

As you know, TAM has been the voice of the trucking industry in Massachusetts since 1919. One of the oldest transportation associations within the Commonwealth, we represent a wide variety of companies ranging from small, family owned trucking companies with a single truck to large national trucking companies with thousands of trucks. The trucking industry within the Commonwealth is responsible for transporting 87%-93% of all goods and products found in our homes and workplaces. In addition to being a key facilitator for the growth of other industries, the trucking industry is a significant creator of jobs within the Commonwealth. As a recent study by the Dukakis Center for Urban Research & Policy at Northeastern University stated “[t]he overall trucking industry (including private and for-hire tucking) represent about one in 12 jobs or about 300,000 jobs in Massachusetts in 2017. And, trucking companies meet all Massachusetts freight movement needs.” (“The Importance of the Trucking Industry to the Massachusetts Economy”, Pritchard, R. & Scott, A., (May 2018)).

TAM’s membership is focused on safety first and foremost. Reducing traffic fatalities involves education and enforcement of the laws for all parties who share the road. Amendment #3, while well-intentioned, will cause additional burden on the industry, without the demonstrated benefits of its implementation. The creation of a back-up camera system was mandated on all vehicles under 10,000 lbs. by the National Highway Traffic Safety Administration (NHTSA). In doing so, NHTSA noted that a significant percentage of “back-up” injuries or fatalities were caused by vehicles of all types under the 10,000 lb. threshold. NHTSA nor Congress specifically sought to regulate vehicles over 10,000 lbs. at this time for a wide variety of reasons – whether based on cost, practical considerations or necessity. The proposed mechanisms already included in Senate Bill 2204 provide additional means for protecting the vulnerable road users. The additional requirement for back-up cameras, at this time, will not necessarily make the operation of vehicles over 10,000 lbs. safer. Accordingly, I respectfully request that Amendment #3 not be adopted.

Thank you for your consideration of this important matter.

Sincerely,

Kevin Weeks
Executive Director