



March 19, 2021

Dear Senator Warren,

On behalf of the Trucking Association on Massachusetts, I write to discuss our shared goal of pursuing meaningful investments in infrastructure in the weeks and months ahead. The trucking industry is eager to work with you, Congress and the Biden Administration to end the continuous cycle of underinvestment in our nation's infrastructure. A bold investment in infrastructure will improve the safety and functionality of our nation's transportation systems while reinvigorating a pandemic-stricken economy.

As that work begins in earnest, we want to convey our strongly-held view that any infrastructure investment must be grounded in long-term, sustainable funding, based on mechanisms where all road users contribute to rebuilding and revitalizing the American transportation network. The trucking industry will aid in those efforts, and welcomes the opportunity to contribute to infrastructure development in a meaningful and efficient way.

However, we strongly caution against discriminatory funding schemes that place the burden of supporting our infrastructure solely on the back of the trucking industry. Forcing the industry to cover the entire gap between available revenue and infrastructure funding needs will jeopardize economic stability, cripple our nation's supply chain, and threaten to decimate recent economic gains. Moreover, it will irreparably fracture the broad stakeholder support that has facilitated the advancement of past highway bills. Therefore, any discriminatory funding schemes, like a truck-only vehicle miles traveled (VMT) tax, will be met with resolute opposition by the industry, and must be dismissed as a misguided and prejudiced funding gimmick.

Mandating that the trucking industry bear the brunt of our nation's infrastructure investment via a truck-only VMT tax is unfair, imbalanced, and runs counter to public interest. In terms of feasibility, there are ample reasons why a truck-only VMT is an ill-conceived and dangerous solution. First, experts agree that proper implementation of a VMT tax will require at least five to ten years to generate revenue because the relevant technology has yet to be fully developed, large-scale field testing has not been conducted, data privacy and security issues have not been addressed, and VMT enforcement mechanisms have not been implemented to combat anticipated evasion. Second, current review of VMT fee pilot programs estimates that collection costs could be as high as 40 cents on the dollar. While full implementation will likely bring these costs down substantially, these estimates suggest collection costs could still be as high as 15%—more than 70 times greater than the cost to collect the fuel tax. Third, a VMT fee would require individual accounts for each taxed vehicle, which, if applied to all road users would affect approximately 270 million vehicles, creating a daunting administrative boondoggle to implement and oversee. Fourth, there is an assumption that electronic logging devices (ELDs), which are currently required in only 28% of commercial motor vehicles, can be used to track miles for the purpose of imposing a VMT fee. However, federal law prohibits government agencies from using ELDs for any purpose other than Hours of Service compliance.

The trucking industry stands ready and eager to work hand-in-glove with Congress and the White House towards stemming our deepening infrastructure crisis. As you and your colleagues work to advance meaningful infrastructure legislation, we urge you to consider funding mechanisms that are built around a system where all who benefit from the transportation system contribute fairly. And, we emphatically caution you against the pursuit of discriminatory funding mechanisms such as a truck-only VMT, which will seriously impede efforts to enact meaningful infrastructure legislation this Congress.

Thank you for your attention and thoughtful consideration of this important and timely matter.

Sincerely,

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