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U.S. DEPARTMENT OF TRANSPORTATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
DOCKET NO. NHTSA-2019-0055

Notice of Proposed Rulemaking:
Federal Motor Vehicle Safety Standards; Compressed Natural Gas Fuel Container Integrity

SUBMITTED BY:
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The American Trucking Associations, Inc. (ATA)[1] provides these comments in response to the National Highway Traffic Safety Administration (NHTSA) notice of proposed rulemaking (NPRM) on *Federal Motor Vehicle Safety Standards; Compressed Natural Gas Fuel Container Integrity*.[2]

As the national representative of the trucking industry, ATA has a strong interest in highway safety and the productivity of all commercial vehicles through best maintenance practices. Highways are the motor carriers' and drivers' workplace. Employing more than 7.8 million people and moving 11.5 billion tons of freight annually,[3] trucking is the industry most responsible for moving America's economy. The trucking industry moves more than 80 percent of our nation's domestic freight and is a critical player in the safety of our nation's roadways—spending approximately $10 billion per year on safety training, technology, equipment, and management.

[1] ATA is a united federation of motor carrier and allied members, state trucking associations, and national trucking conferences and councils created to promote and protect the interests of the trucking industry. Directly and through its affiliated organizations, ATA represents more than 40,000 industry stakeholders in the United States encompassing every type and class of motor carrier operation.
[2] 84 Red. Reg. 29145.
[3] ATA. (2019). *ATA American Trucking Trends 2019*. Arlington, VA. American Trucking Associations.

ATA applauds NHTSA's action in responding to ATA's April 2016 petition to amend the visual inspection labeling requirement in the Federal Motor Vehicle Safety Standard (FMVSS) No. 304, ''Compressed natural gas fuel container integrity,'' to state that compressed natural gas (CNG) fuel containers used on commercial motor vehicles (CMVs) "heavy vehicles" should be inspected at least once every 12 months.

As initially petitioned for,[4] ATA agrees with the agency's statement that, "[C]NG heavy vehicles are typically used in high-mileage commercial fleet operations and following the current mileage-based inspection interval on the label means conducting multiple visual inspections per year. NHTSA has tentatively concluded multiple visual inspections per year based solely on mileage would not improve vehicle safety for these high-mileage CNG heavy vehicles, and could potentially reduce safety. Because the current periodic visual inspection interval is intended for light vehicles and is consistent with the operation of these vehicles, no change is proposed to the periodic visual inspection interval for CNG fuel containers on light vehicles."[5] ATA commends NHTSA for partially granting its petition and the petition from Natural Gas Vehicles for America (NGVA) and strongly supports immediate application of the amended requirements for our members. Recognizing NHTSA's initial intention for light "non-commercial" vehicles in FMVSS 304 is imperative to provide equal benefits for owners and operators of commercial CNG vehicles. This action will enable all CNG-equipped CMV users to begin reducing maintenance costs immediately.

Commercial uses for natural gas vehicles (NGVs), either fueled by CNG, liquefied natural gas (LNG), or renewable natural gas (RNG), have increased in recent years. In particular, motor carriers that have established predictable duty cycles for their CMVs have transitioned their fleets to natural gas as a price steadier alternative to diesel.[6] Also, as stated by NGVA, NGVs are 90% cleaner than the Environmental Protection Agency's current oxides of nitrogen standard and emit up to 21% fewer greenhouse gas emissions than comparable gas and diesel vehicles – 382% fewer when fueled by RNG.[7] Although ATA is fuel neutral, changes in State and Federal emissions laws are on the horizon and motor carriers are planning equipment purchasing and routing of freight accordingly. ATA supports laws, regulations and enforcement directed at lowering emissions and this proposed change to FMVSS 304 removes impediments to adoption of cleaner CMVs.

NHTSA's proposed change to FMVSS 304 relieves motor carriers of frequent and burdensome preventive maintenance inspections (PMIs) currently required of commercial NGVs. A conventional diesel-fueled CMV may receive multiple PMIs throughout a given year due to its duty cycle – each common to surpass the one-time annual DOT vehicle safety inspection. Under the proposed change outlined in the Agency's NPRM, a commercial NGV would have similar timely PMIs performed and one annual natural gas fuel tank inspection – providing a decrease in time to a lengthy and costly process. This change to FMVSS 304 will reduce motor carrier costs by freight and equipment downtime,

[4] 84 Fed. Reg. 29146.
[5] 84 Fed. Reg. 29145.
[6] USDOE, Clean Cities. (2018). *Clean Cities Alternative Fuel Price Report*. U.S. Department of Energy.
[7] Natural Gas Vehicles for America. Retrieved from https://www.ngvamerica.org/.

decreasing NGV repair facility use, lessening NGV technician labor, and lowering the risk of NGV fuel system component damage.

ATA recommends NHTSA to work with its Technology & Maintenance Council (TMC)[8] as a resource for industry studies and to better work together in developing best practices and guidance among relevant trucking maintenance and engineering issues. In 2017, TMC published Recommended Practices (RP) 370, "Natural Gas Vehicle Specification and Implementation Guidelines," RP 371, "Natural Gas Vehicle Inspection and Maintenance Guidelines," and RP 542, "Maintenance Facility Development Guidelines for Natural Gas Vehicles."[9] Through these industry-recognized best practices and additional advocacy roles, ATA is very supportive of NGV maintainability and durability. Modifying the periodic visual inspection interval for CNG fuel containers installed on heavy vehicles is invaluable to motor carriers and will assist their long-term sustainability goals.

ATA agrees on modifying the FMVSS No. 304 label for visual inspection of CNG fuel containers to state: ''This container should be visually inspected for damage and deterioration after a motor vehicle accident or fire, and either (a) at least every 12 months when installed on a vehicle with a GVWR greater than 4,536 kg or (b) at least every 36 months or 36,000 miles, whichever comes first, when installed on a vehicle with a GVWR less than or equal to 4,536 kg."[10] This new label for visual inspection of CNG fuel containers satisfies ATA's petition and provides equal benefits for owners and operators of commercial and non-commercial NGVs.

Again, the ATA thanks NHTSA for granting its petition for amending FMVSS 304 and appreciates your consideration of our comments. If you have any questions, please contact Ross Froat at (703) 838-7980 or rfroat@trucking.org.

[8] ATA's Technology & Maintenance Council (TMC) is an association of industry practitioner professionals who work together to improve truck equipment and technology. TMC develops industry-recognized best practices that are used by fleet managers to efficiently specify and maintain vehicles. TMC also provides guidance to manufacturers in the design of their equipment.

[9] ATA Technology & Maintenance Council. (2018). *Recommend Practices Manual 2018-2019*. Arlington, VA. American Trucking Associations.

[10] 84 Fed. Reg. 29150