

Voith US Inc. | VTI, 25 Winship Rd., York, PA 17406-8419, United States

Voith Group
Group Division Turbo

Note: Comments from Voith US Inc / VTI
to the Docket No. DOT-OST-2019-0165

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Dear Madam or Sir;

With the introduction of the New Technologies to help complying to the GHG-Phase II Freight Transportation Efficiency Regulation, including but not limited to: Smaller Engine Displacements, Lower Engine Revolutions at Cruise Speed, Aerodynamic Packages and Low Roll Resistance Tires to decrease drag resistance, amongst others. The combination of these innovations are expected to increase stress on braking systems of the Heavy Duty Trucks.

On the other hand, the FMVSS-121 rules only the emergency brake distance, allowing cooling down the service brakes between cycles and consequently not considering brake fatigue. This rule has not been updated considering the new mentioned innovations and its consequences on the new levels of stress the Service Brakes will have to handle.

Consequently, NETT and NHTSA should look for more safety-related regulations as it happens in other parts of the World where, in the above mentioned examples, Endurance Braking should be considered as a major factor for Safety.

Europe and Latin America uses ECE-R13 as Safety Regulation for Endurance Braking.

Respectfully
Luiz Soares – Business Development
Robert Wiss – Sales