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August 31, 2002

Mary E. Peters
Federal Highway Administrator
U. S. Department of Transportation
Federal Highway Administration
400 Seventh Street SW
Washington, DC 20590

Docket Number: FHWA-2001-10370

Dear Ms. Peters:

The Truck Trailer Manufacturers Association (TTMA) respectfully submits the following comments to the above docket number. Your agency is requesting comments on two separate issues and we would like to comment on the first, which is the proposal to increase the distance that width exclusive devices could project from the side of a commercial vehicle from three to four inches. TTMA agrees with this as a step to harmonize size and weight limits.

TTMA further agrees with the definition of "overall width" proposed for standard use by the three countries, as set by the LTSS Working group 2, of 10 centimeters which equates to 3.937 inches using acceptable conversion factors. The addition of 1 inch on each side should not interfere with any operational issues and will in fact allow for additional safety devices to be incorporated into trailer design.

This additional exclusion along with the recently issued final rule from FMCSA defining width exclusive devices will make for a clear rule, that all manufacturers and users of commercial vehicles will be able to understand and comply with.

As we have done consistently for years TTMA supports the NPRM to harmonize rules and regulations between the North American Countries. Harmonization of rules and regulations is key to the smooth and efficient operation of trailer manufacturing and use. We thank you for the opportunity to offer these comments.

Sincerely

Jeff Sims

Jeff Sims
Engineering Manager