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STATE OF VERMONT
AGENCY OF TRANSPORTATION
DEPARTMENT OF MOTOR VEHICLES
120 State Street, Montpelier, Vermont 05603-0001



26 September 2002

Ms. Mary E. Peters, Administrator
Federal Highway Administration
Docket Management Facility
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

02 OCT -8 PM 12:16
OFFICE OF TRANSPORTATION

RE: Docket Number FHWA-2001-10370 - 9

Dear Ms. Peters:

The Federal Highway Administration (FHWA) has proposed two separate issues. The Vermont Department of Motor Vehicles (DMV) respectfully submits the following comments on the second issue. The DMV supports the removal of recreational vehicles (RVs) from consideration as a commercial vehicle and therefore the need for an 'over-width permit' for the short period of time that an RV can be considered a commercial vehicle.

We believe that RVs are designed and manufactured for personal use. The period of time an RV is in transit from the manufacturer's factory to a dealership is so brief that it is an inefficient use of the state's resources and an administrative burden to process a commercial over-width permit for such vehicles.

Recognizing a trend, in 2001, Vermont amended its statute to allow appurtenances attached to personal use RVs to extend, "...no more than 6 inches beyond the body of the vehicle..." However, we must still execute a Federal over-width permit process to address the commercial transportation of these vehicles. The proposed rule would eliminate such a need.

Furthermore, the awning we refer to is situated at or near the top of the vehicle and there is no evidence that it presents any safety problems. Shade awnings attached to a 102 inch wide RV are certainly legal in Vermont and many other states as well. We have found no evidence of operators having difficulty maneuvering their vehicles or creating safety problems as a result of an awning or appurtenance.

In fact, the 2000 Fatal Accident Reporting System (FARS) data indicates that fatal vehicle accidents involving RVs were statistically insignificant, (no FARS data is available on unit width or awnings).

For the above reasons, the DMV supports the rule proposal to exempt recreational vehicles from the definition of commercial vehicle and the amendment to allow RVs to have non-cargo appurtenances extended beyond 4 inches without the need for a special use permit.

Very truly yours,

A handwritten signature in black ink that reads "Bonnie L. Rutledge". The signature is written in a cursive, flowing style.

Bonnie L. Rutledge
Commissioner