

National Association of Trailer Manufacturers

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March 12, 2001

To: US Department of Transportation
Docket Management Facility
Room PL-40
400 Seventh Street, SW
Washington, DC 20590-0001

From: The National Association of Trailer Manufacturers

Re: Development of a North American Standard for protection against shifting and falling Cargo

FMCSA Docket No.: FMCSA-97-2289

These comments are submitted on behalf of the Board of Directors of the National Association of Trailer Manufacturers.

It is recognized that these new regulations are primarily directed toward heavy cargo securement and that the impetus for these proposals comes from the past experiences of hauling heavy loads such as logs and steel coils. Further, it is also noted that very little is mentioned about specific features of trailers and their respective anchor points. It is also noted that the proposed regulations shall apply to CMV's engaged in interstate commerce with GVWR's of over 10,000 lbs. This is the part that gets our attention!

Our association is dedicated to promoting safety in trailers under 26,000 lbs. GVWR. We focus on that segment of the trailer industry. We have observed repeatedly that regulations are written based on experiences of tractor-trailer rigs--- the big ones--- all over 26,000 lbs GVWR--- and then are automatically applied to the much smaller and much different trailers.

We respectfully submit that the major differences of frame structure, platform height, axle placements and towing methods are significant and they do affect handling, loading, and safety characteristics of these trailers.

Therefore, our general concern and fear is that regulations are developed and applied to our segment of the industry without considering their real needs, designs and ultimate impact on manufacturing costs.

We suggest that rule making in this case of cargo securement be applied only to those trailers (over 26,000 lbs. GVWR) where they are needed.

If these proposed rules are adopted for all trailers above 10,000 lbs. GVWR we do have one specific concern. That is the proposed ruling spelled out in article 4.9 of the draft regulation where tracked and wheeled equipment shall be positioned with the tracks or wheels against the gooseneck to prevent forward movement. In many cases, it is best to place the load with respect to the axles so that desired hitch weight is accomplished. It is our suggestion that rules relating to securement should not dictate the location of the load in the body of the vehicle. The load should be placed for best and safest handling characteristics.

Respectfully submitted by
The National Association of Trailer Manufacturers

Jim Callaway, President

Roland Gehman, Immediate Past President

