



Owner-Operator Independent Drivers Association

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January 25, 2018

The Honorable John Barrasso
Chairman
Committee on Environment & Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Thomas Carper
Ranking Member
Committee on Environment & Public Works
456 Dirksen Senate Office Building
Washington, DC 20510

Re: Proposed Rule for Repeal of Emission Requirements for Glider Kits

Chairman Barrasso and Ranking Member Carper,

In advance of the Committee receiving testimony from Scott Pruitt, Administrator of the U.S. Environmental Protection Agency (EPA), the Owner-Operator Independent Drivers Association (OOIDA) and our 160,000 members write to express our support for the agency's reconsideration of Phase 2 emission requirements for glider vehicles, glider engines, and glider kits. For many small-business truckers, glider kits offer a more affordable and reliable alternative to increasingly expensive new commercial motor vehicles. Their regulation under Phase 2 would effectively destroy the American glider kit industry, eliminating the opportunity for our members to purchase vehicles that best fit their unique needs.

The EPA's initial decision to classify glider kits, glider vehicles and glider engines as "new motor vehicles" under the Clean Air Act (CAA) would irreparably damage a truck manufacturing industry that has become increasingly popular in recent years. Since 2002, federal environmental regulations have increased the price of a new truck between \$50,000 and \$70,000, as costly and failure-prone components and systems have been mandated. Given their unique assembly, glider kit prices are typically 25-30% less than a new truck, allowing owner-operators, who often work on the slimmest of margins, to save tens of thousands of dollars on their purchase.

Many truckers who drive glider kits are familiar with their engines and capable of performing routine maintenance independently. This is rarely an option for those driving newer trucks that feature more complex technology and components. As a result, the maintenance and repair of newer vehicles must frequently be done by systems experts at a dealership, which typically comes with a hefty price tag for service and equipment. Additionally, visiting a dealership for service forces an owner-operator off the road for extended periods of time, limiting his or her ability to generate income.

While glider kits provide appealing cost savings for drivers, they are also reliable, efficient, and meet all of the required environmental and safety standards necessary for operation, as documented in a recent study by Tennessee Tech University. In this study, an array of remanufactured engines and original equipment manufacturer (OEM) "certified" engines were evaluated for fuel efficiency and emission standards. Ultimately, researchers discovered remanufactured 2002-2007 engines performed as well as OEMs, and in some cases, outperformed their newer counterparts in emissions reductions. This

environmental benefit is compounded when considering glider kits utilize many remanufactured components, resulting in the reuse of approximately 4,000 pounds of cast steel per unit.

The economic and environmental benefits of glider kits have resulted in growing popularity among independent drivers. In a recent survey of OOIDA members, 14% of respondents who plan to purchase a commercial motor vehicle in the next several years favored glider kits, while only 12% would buy a new truck. These figures illustrate a dramatic growth in the glider kit market, as just 3% of 2003 respondents indicated a preference for glider kits. This growth also reflects the desire of small-business truckers to find alternatives that meet both their budgetary and operational needs as the cost of new trucks continues to skyrocket.

While the EPA has sought public comment on production caps, no limitations of any quantity should be placed on American manufacturers. The glider kit industry has grown exponentially in the last decade because manufacturers have developed a product that appeals to small trucking businesses, which comprise 96% of U.S. motor carriers. Imposition of an arbitrary production cap would unfairly restrict supply and artificially increase the cost of glider kits beyond the budgets of most owner-operators. The federal government must avoid any market manipulation and afford glider kit manufacturers the opportunity to satisfy the demand for their innovative products.

Additionally, we applaud Administrator Pruitt's efforts to better understand how the regulation of glider kits will impact small-business truckers, who are the vehicles' top consumers. The agency's interest in learning more about the challenges and needs of all stakeholders throughout the regulatory process is welcomed. We believe this approach will help develop a regulatory climate that protects the environment while supporting businesses of all sizes.

Again, OOIDA supports the EPA's proposal to reconsider the emission requirements for glider vehicles, glider engines, and glider kits. Exempting these vehicles from Phase 2 regulations will continue to provide owner-operators affordable and reliable options when purchasing new or used trucks. While glider kits provide appealing cost savings for drivers, they are also reliable, efficient, and meet all of the required environmental and safety standards necessary for operation. We encourage the EPA to move forward with this important repeal and we encourage members of the Committee to support the agency's efforts.

Sincerely,



Todd Spencer
Acting President
Owner-Operator Independent Drivers Association, Inc.

Cc: Members of the Committee on Environment & Public Works