



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

October 6, 2023

Docket Operations

U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Room W12-140
Washington, DC 20590-0001

RE: Docket Number: FMCSA-2022-0003
Safety Fitness Determination

The Commercial Vehicle Safety Alliance (CVSA) respectfully requests a 30-day extension to the comment period for the advance notice of proposed rulemaking (ANPRM) from the Federal Motor Carrier Safety Administration (FMCSA) regarding safety fitness determinations, published in the Federal Register on Aug. 29, 2023, Docket No. FMCSA-2022-0003.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to prevent commercial motor vehicle crashes, injuries and fatalities and believes that collaboration between government and industry improves road safety and saves lives. Our mission is to improve commercial motor vehicle safety and enforcement by providing guidance, education and advocacy for enforcement and industry across North America.

CVSA applauds the agency for seeking public comment on this critical issue and we look forward to providing comments on behalf of CVSA's membership. However, in order for CVSA to provide FMCSA with comments that will contribute to a comprehensive and well informed NPRM, additional time is needed. CVSA's Policy and Regulatory Affairs Committee met at the CVSA Annual Conference and Exhibition in September and had an initial discussion on the ANPRM. The committee is meeting again on October 18 to continue this discussion and approve recommended comments for consideration by the CVSA Board of Directors. The complexity of the issues presented in the ANPRM constitutes good cause for allowing additional time for CVSA and other stakeholders to comment and will benefit FMCSA by ensuring the agency received the highest quality feedback to consider as part of this rulemaking.

CVSA works to closely monitor, evaluate, and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the agency's consideration of our request for an extension to the comment period.

If you have further questions or comments, please do not hesitate to contact me at 202-998-1008 or collin.mooney@cvsa.org.

Respectfully,

A handwritten signature in black ink, appearing to read "Collin B. Mooney". The signature is fluid and cursive, with the first name "Collin" being more prominent than the last name "Mooney".

Collin B. Mooney, MPA, CAE
Executive Director
Commercial Vehicle Safety Alliance