



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

August 26, 2024

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-2024-0208
Regulatory guidance; notice of review of guidance

The Commercial Vehicle Safety Alliance (CVSA) respectfully requests a 60-day extension to the comment period for the notice of review of guidance from the Federal Motor Carrier Safety Administration (FMCSA) regarding the agency's regular review of existing guidance documents, published in the Federal Register on Aug. 13, 2024, Docket No. FMCSA-2024-0208.

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 commends the agency for reviewing and revising its regulatory guidance. Continued review and updates to guidance to remove redundancies, reflect recent changes, correct errors and eliminate contradictions provides both the enforcement community and motor carrier industry with clearer guidelines to follow. However, given the volume of existing guidance, CVSA is requesting a 60-day extension to the comment period. FMCSA's Guidance Portal includes more than 1,300 individual guidance documents, dating as far back as 1987. Given the large number of documents that will need to be reviewed and analyzed, 30 days is not an adequate amount of time to provide substantive, meaningful feedback to the agency. Considering that this regulatory review is conducted once every five years, it is critical that stakeholders be given sufficient opportunity to identify potential issues and suggest solutions. Granting this extension request would allow CVSA and other stakeholders the time needed to provide the agency with quality feedback.

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.

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