



**TESTIMONY OF
Timothy S. Doyle
ON**

**L.D. 522, “An Act To Require That Motor Vehicles Be Clear of
Snow When Operated on Public Ways”**

Good afternoon, Senator Chipman, Representative Williams, and members of the Transportation Committee. My name is Tim Doyle and I am the Vice President of Maine Motor Transport Association. The Association is comprised of over 1,700-member companies, whose employees comprise a large portion of the nearly 34,000 people who make their living in the trucking industry in Maine.

I am here today to testify in opposition to LD 522.

The Association strongly believes in highway safety, and certainly understands why this bill has been presented. This issue has been debated in this committee previously however the problem remains because there is no easy solution. Clearing the snow and ice from passenger vehicles is relatively easy and safe to accomplish. Clearing the snow and ice from commercial trucks, however, is not easy, safe, and sometimes not even possible.

In climates such as Maine’s, snow and ice will always present a problem for our Industry. Snow that accumulates on trailer roofs

thaws and re-freezes and eventually causes ice. The remaining ice may not even be visible to the driver from the ground as it may be a thin layer in a sagging portion of the trailer roof. When trucks leave to deliver their products, the snow blows off the trailers and any ice that has accumulated may also come off hitting the highway or potentially hitting vehicles that are following too closely.

It would seem that an easy solution would be to have the driver clean the top of the trailer prior to travelling on a public way. Motor Carriers and drivers endeavor to do this whenever possible, however it presents a huge challenge as the trailer roofs are 13' 6" in the air. Motor Carriers that allow their drivers to climb that high to clear trailers would be in violation of OSHA regulations which prevent working at such heights without proper safe guards which are not available to drivers on the road. Further, the trailers are not built to accommodate walking on top of them. Box trailers are either thin metal or translucent plastic and are simply not designed to hold much weight. Walking on top, especially when it is slippery, would be dangerous for drivers. Some commercial motor vehicles, such as tankers, cranes, cement mixers, logging trucks etc. are also not conducive to such clearing.

Some Maine motor carriers have purchased snow scrapers which serve to clear snow and ice from the top of the trailers or deploy other clearing options such as TruckBrush. These solutions can work well for trucks that start from the home terminal and end up there at the end of each shift. This however is not the norm for much of our

industry. Drivers on the road have very few publicly available options for clearing snow from trailer roofs.

Our Association believes that the long-term answer to this problem is to engineer a solution that would prevent snow and ice from accumulating on trailers in the first place. We have joined with 31 other state trucking associations who have written to the National Transportation Safety Administration and the Federal Motor Carrier Safety Administration to urge them to work collectively with the trucking industry to determine the scope of the problem and develop the most practical, effective, and economically viable approaches to address the problem.

We also advocate each year for our members to do everything within their control to ensure that trucks are clear of snow, ice, or any other debris that can fall from their trucks during travel. We do this by publishing articles in our newsletter that's available to all members and we strive to remind them annually.

We appreciate the sponsors attempt to find compromise, giving up to 48 hours after a snow event to clear the trailer. While this certainly mitigates the potential for fines, it seems to us difficult to enforce while doing little to solve the problem as accumulated snow is typically gone from trailer roofs soon after they begin travel.

We urge the committee to vote ought not to pass on this bill, or to carve out commercial trucks for which it would be impractical, unsafe and perhaps impossible to clean of ice and snow.

Thank you and I would be happy to answer any questions the committee may have.