



1550 Crystal Drive, Suite 804
Arlington, VA 22202
T: 800-424-2869
T: 202-244-4700
F: 202-966-4824

October 23, 2023

Hon. Robin Hutcheson
Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

RE: FMCSA-2023-0153 Agency Information Collection Activities; Renewal of an Approved Information Collection: Truck and Bus Maintenance Requirements and Their Impact on Safety

Dear Administrator Hutcheson:

The National Waste & Recycling Association (NWRA) appreciates the opportunity to comment on the Federal Motor Carrier Safety Administration's (FMCSA) Agency Information Collection Activities; Renewal of an Approved Information Collection: Truck and Bus Maintenance Requirements and Their Impact on Safety (FMCSA-2023-0153). NWRA would like to coordinate with FMCSA and the Virginia Tech Transportation Institute (VTTI) to actively recruit participants in the project. NWRA's members and Safety Committee do have some concerns: the request for information does not explicitly provide a breakdown of trucks based on operation type, short haul vs. over the road vs. bus. The nature of short haul operations, particularly in the waste and recycling industry puts different stresses on vehicles as compared to over the road trucks. For instance, waste and recycling trucks brake many more times a day, a waste and recycling load has an ever-changing center of gravity as the truck is loaded throughout the day, and our members' trucks are backing many more times throughout the day.

NWRA is a trade association that represents private-sector waste and recycling companies in the United States, including the first, fifth, and tenth largest commercial fleets, as well as manufacturers and service providers who do business with those companies. NWRA's members operate in all 50 states and the District of Columbia. NWRA provides leadership, education, safety expertise, research, and

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advocacy to promote North American waste and recycling industries, serve as their voice, and create a climate where members prosper and provide safe, economically sustainable, and environmentally sound services.

NWRA appreciates the opportunity to engage FMSCA and we look forward to continuing to work with your office on this matter. Should you have any questions, please contact me at ksander@wasterecycling.org or 202-364-3750.

Very truly yours,

A handwritten signature in blue ink, appearing to read "K. M. Sander", is written over a faint, larger blue ink signature that is partially obscured.

Kirk M. Sander
Chief of Staff and Vice President for Safety & Standards