Docket No OPMO-0184
ITEM 30

U.S. Department of Transportation
Office of the Secretary of Transportation

Office of Assistant Secretary
400 Seventh St., S.W.
Washington, D.C. 20590

APR 25 1985

N-96-01
II-A-993

Mr. Charles L. Elkins
Acting Assistant Administrator
for Air and Radiation
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Elkins:

We have reviewed the draft copy of the Proposed Rulemaking increasing the stringency of the noise emission standard for medium and heavy trucks manufactured on or after January 1, 1988 and revising the regulation for motor carriers engaged in interstate commerce.

In general, we support the proposed package. We particularly applaud EPA for considering both regulations in complementary fashion. We have no problem with further deferral of the medium and heavy truck standards. However, we do have one concern with respect to the interstate motor carrier regulation.

We note that the overwhelming number of trucks on the highways will comply with the new regulation. In fact, since 1974, the average in-use truck high speed noise levels have been lower than the proposed standard. We would thus favor the regulatory option that would apply the new interstate motor carrier noise standard to all 1978 and later model year vehicles, although we see merit in applying the standard to earlier model year trucks.

While this option might be costly to a relatively small proportion of truck operators, it would provide a greater degree of environmental protection and facilitate enforcement. The draft NPRM contains only qualitative statements on the impact of this option on the trucking industry. This option should be thoroughly examined with respect to its cost-effectiveness.

We appreciate the opportunity to comment.

Sincerely,

Matthew V. Scocozza
Assistant Secretary for Policy
and International Affairs