



Owner-Operator Independent Drivers Association

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February 9, 2017

The Honorable Elaine Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Executive Order, “Reducing Regulation and Controlling Regulatory Costs”

Dear Secretary Chao:

On January 30, 2017, President Donald Trump issued an Executive Order requiring the elimination of two existing regulations for each newly proposed federal rulemaking. We applaud the administration’s efforts to promote economic growth through regulatory relief and are eager to work with you to implement the Executive Order in a responsible and safe manner. A wide variety of industries, including the 160,000 small trucking businesses we represent, will all be negatively impacted by two massive Department of Transportation (DOT) rulemakings advanced under the previous administration. When identifying significant regulations for repeal under the Executive Order, we believe your department must prioritize the Electronic Logging Device (ELD) mandate and speed limiter proposed rule.

Collectively, these rulemakings would cost over \$2.5 billion to implement, without providing any safety or economic value to our members or the American public. Independently, both meet the cost threshold included in the administration’s interim guidance to be considered significant regulations under the Executive Order, with the ELD mandate estimated to cost a whopping \$2 billion and the speed limiter proposed rule adding an additional \$524 million in implementation costs. Because the limited number of large companies that benefit from the use of ELDs and speed limiters are already utilizing the technology, almost all the \$2.5 billion in costs associated with these regulations will be borne by industries like ours, which include hundreds of thousands of small businesses.

President Trump’s desire to create a regulatory environment that enables businesses of all sizes to grow is commendable and welcomed. However, to do so, this administration must eliminate the most egregious regulations developed under the haphazard ‘one size fits all’ approach to rulemaking embraced by its predecessor. The removal of the ELD mandate and speed limiter

proposed rule would provide immediate and overdue regulatory relief to a wide variety of industries, allowing them to devote greater resources to growth. Of all the regulations your department will consider repealing under the Executive Order, none will have a more positive impact on American businesses than these two costly and burdensome rules. We encourage you to prioritize the ELD mandate and speed limiter proposed rule when identifying regulations for elimination.

Sincerely,

A handwritten signature in cursive script, appearing to read "Todd Spencer".

Todd Spencer
Executive Vice President
Owner-Operator Independent Drivers Association

cc: Members of the Senate Committee on Commerce, Science & Transportation
Members of the House Committee on Transportation & Infrastructure