

# Longer Double-Trailer Trucks Endanger Motorists and Damage Infrastructure

Prepared by CABT, January 2024

A few large trucking companies are pushing Congress to force states to allow longer double-trailer trucks, or “Double 33s.” These longer double-trailer trucks would replace not only today’s shorter, 28-foot double-trailer trucks, but also many 53-foot single-trailer trucks that commonly operate on the road today. Longer double-trailer trucks would add new dangers for motorists and damage our infrastructure.

Double 33s are 91 feet in length—that is 10 feet longer than the current doubles they are intended to replace and 17 feet longer than current single-trailer trucks. In 2015, Congress rejected these longer double-trailer trucks,<sup>1</sup> and the United States Department of Transportation (USDOT), in its 2016 Comprehensive Truck Size and Weight Limits Study, recommended that Congress not approve these or any other longer or heavier trucks.<sup>2</sup>

## Double 33s Would Replace Single-Trailer Trucks

Double-trailer trucks represent a relatively small percentage of trucks operating on our roads today. The majority of combination trucks in operation are 53 foot single-trailer trucks. If Congress requires states to allow the longer doubles, today’s truck traffic would change dramatically. Since Double 33s have 24 percent more capacity than 53 foot trailers, market forces would push companies currently operating single-trailer trucks to replace their fleets with Double 33s. According to a 2015 analysis, this would incur a massive shift from single-trailer trucks to Double 33s, resulting in approximately **42 to 101 billion additional miles of double-trailer truck travel on our nation’s highways.**<sup>3</sup>

## Longer Double-Trailer Trucks Would Add New Dangers to the Highways

An influx of double-trailer trucks on the highway would have severe safety implications for motorists. Studies have consistently shown that multi-trailer trucks—doubles and triple-trailer trucks—are more dangerous than single-trailer trucks. A 2013 Marshall University-led study<sup>4</sup> found that double-trailer trucks have an **11 percent higher fatality rate** than single-trailer trucks. This result is consistent with findings made by USDOT in a 2000 study.<sup>5</sup> Below are several reasons these trucks are more dangerous:

**1. Longer stopping distances.** Double 33s take 252 feet to stop—that is a 17-foot longer stopping distance than today’s single-trailer trucks and 22 feet longer than today’s twin-trailer trucks.<sup>6</sup>



<sup>1</sup> On Nov. 10, 2015, the Senate rejected increasing the length of double-trailer trucks as part of the surface transportation reauthorization bill on a 56-31 floor vote; and on Nov. 18, 2015, the U.S. Senate rejected increasing the length of double-trailer trucks on the omnibus spending bill on a voice vote.

<sup>2</sup> USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress.*

<sup>3</sup> Mingo, Roger D., and Mark L. Burton, Mark L.; 2015. *Mandated Twin 33 Trailers Produce Costly Shifts in Freight Movement.*

<sup>4</sup> Marshall University, 2013. *An Analysis of Truck Size and Weight: Phase I – Safety.*

<sup>5</sup> USDOT; 2000. *Comprehensive Truck Size and Weight Study.*

<sup>6</sup> USDOT; 2015. *Comprehensive Truck Size and Weight Limits Study, Highway Safety and Truck Crash Comparative Analysis Technical Report.*

**2. Increased rollover propensity and rearward amplification.** Double 33s experience increased rollover vulnerability, poorer stability and a compromised ability to make avoidance maneuvers compared to single-trailer trucks.<sup>7</sup>

**3. More wear and tear.** Double-trailer configurations have 58 percent higher out-of-service violation rates than single-trailer trucks.<sup>8</sup> This is especially important because a 2016 study by the Insurance Institute for Highway Safety (IIHS) found that trucks with any out-of-service violation are 362 percent more likely to be involved in a crash.<sup>9</sup>

### **Double 33s Would Cause Significant Infrastructure Damage**

According to the 2016 USDOT study, Double 33s would increase pavement damage by 1.8 percent to 2.7 percent,<sup>10</sup> which translates to **\$1.2 to \$1.8 billion in estimated pavement damage every year.**<sup>11</sup> This does not include state, county and municipal roads, which are built to lower standards than federal infrastructure.

Also, USDOT found that nearly 2,500 Interstate and other National Highway System bridges would need to be strengthened or reinforced to handle the longer double-trailer trucks, costing taxpayers up to **\$1.1 billion.**<sup>12</sup> The study accounts for only 20 percent of bridges—the other 80 percent of bridges on state and local roads would be more vulnerable to the longer trucks.

### **Many Trucking Companies Oppose Double 33s**

The Truckload Carriers Association (TCA), representing over 700 trucking companies, strongly opposes longer double-trailer trucks. In fact, TCA wrote to Members of Congress in 2015 to express their concerns over increasing the length of double-trailer trucks, stating that these trucks would increase costs of delivering freight, decrease fuel efficiency, incur additional expenses to train or retrain drivers, increase the potential for driver injuries while coupling and decoupling trailers, and exacerbate truck parking problems.<sup>13</sup>

### **The Double 33s Mandate Would Override State Laws**

This legislation would preempt state laws and require every state to allow longer double-trailer trucks on their roads, even if they determined that their roadways were not capable of safely accommodating the longer trucks or that they would damage their pavement and bridges.

### **Double 33s Are Heavier Than Today's Twin 28s**

According to USDOT, Double 33s will, on average, be over four tons heavier than today's Twin 28s due to added capacity.<sup>14</sup> Longer stopping distances, increased crash severity and increased pavement and bridge damage of Double 33s are all negative impacts attributed to the additional weight.

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<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

<sup>9</sup> Insurance Institute for Highway Safety; 2016. *Crash Risk Factors for Interstate Large Trucks in North Carolina*.

<sup>10</sup> USDOT; 2015. *Comprehensive Truck Size and Weight Limits Study, Volume 1: Technical Reports Summary*.

<sup>11</sup> R.D. Mingo and Associates; 2015. Analysis of 2012 FHWA Highway Statistics and selected Cost Allocation studies.

<sup>12</sup> Ibid.

<sup>13</sup> Truckload Carriers Association; October 20, 2015. Letter to House Transportation and Infrastructure Committee Chairman Bill Shuster and Ranking Member Peter DeFazio.

<sup>14</sup> USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress*.