

## SC&R Foundation Cover Letter

31 December 2018

On Behalf of the Board, Officers, Research Committee....

The SC&R Foundation is pleased to present to the SC&RA the Report by ATRI and Paul Ross. The Foundation felt that this study is of high importance to the SC&RA and members, so we could quantify what we already know: Redundant and unnecessary regulation causes unnecessary costs, adversely impacts SC&RA Members, their customers, and associates.

The release of this collaborative report has been timed to coincide with a national distribution of SC&RA's Uniform Permit Transport 2021 (UPT21) initiative. This distribution to State officials, trucking associations, manufacturers and more will include current state, regional, and national maps and charts illustrating comparisons to our minimum weight recommendations.

This study focuses primarily on the additional significant costs precipitated and resulting from the lack of minimum permitted weight uniformity in the United States pertaining to a quad trailer configuration. In a much broader sense however, it also clearly illustrates the "over and above" financial implications also directly apply to the economies of movement across a much wider range of equipment configurations moving over dimensional product every day.

We have taken these "hard to measure" cost implications from this study one step further and conducted a member driven survey using duplicate routing and mileage driven scenarios from the ATRI Cost Differential Table section.

Based on this recent survey, we have summarized the results into two sections:

- Direct extra costs to customers for circuitous versus direct miles
- Direct extra costs to carriers for circuitous versus direct miles

In general, average percentage increase to customers ranged from 45 – 82 %, per move. Additionally, average financial increase to customers ranged from \$4,245 to \$5,440 in aggregate dollars.

We feel that State and Local operating constraints driven by regulation cause additional "incidental" financial impacts. Depending on a given operator's location and operating characteristics, there may be additional excess costs in the thousands of dollars per run, for unplanned expenses in wages, detention, escort lodging, law enforcement support, infrastructure management costs (traffic lights, sign relocation, etc.) due to additional overtime, rescheduling, or other ancillary costs driven by state or federal HOS or operating hour constraints driven by extra working days. A confidential survey of several contributing members' cost data confirmed significant variability, not all of which was reflected in the ATRI work.

These cost analytics not only validate our harmonization driven initiatives but combined with the overall scope of this report, provide us with invaluable resources going forward at all levels as we promote minimum permit weight uniformity across our country.

Sincere thanks to Contributing Members, Steven Todd, Paul Ross, and ATRI for helping us complete the first quantitative look at these unique to our industry impacts, that our members struggle with every day.

On behalf of the Foundation Research Committee, Officers, and Board of Directors,

SC&R Foundation