June 16, 2020

The Honorable Peter DeFazio  
Chairman  
Committee on Transportation & Infrastructure  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Sam Graves  
Ranking Member  
Committee on Transportation & Infrastructure  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairman DeFazio and Ranking Member Graves:

On behalf of NAFA Fleet Management Association, I would like to thank you for your leadership in working to put forth the multi-year surface transportation reauthorization bill, such as H.R. 2, the *Investing in a New Vision for the Environment and Surface Transportation (INVEST) in America Act*. NAFA supports efforts to continue advancing H.R. 2 through the legislative process and urges Congress to finalize surface transportation reauthorization before the 2020 expiration of the FAST Act (Pub. L. No. 114-94).

NAFA has more than 2,000 individual fleet manager Members who are employed by corporations, universities, government agencies (federal, state, and local), utilities, and any other entities that use vehicles in its normal conduct of business. NAFA Members are in control of more than 4.2 million vehicles and manage assets in excess of $92 billion. These vehicles travel more than 84-billion miles each year. The fleets managed by NAFA’s Members run the gamut from light- to heavy-duty vehicles, and depending on the employer’s mission, these fleets may be contained to one specific geographic area, dispersed among multiple regions or states, or be in multiple countries. In addition, NAFA is supported by more than 1,000 associate members who represent companies that support fleet managers in their jobs. These include vehicle manufacturers, leasing companies, aftermarket equipment suppliers, telematics firms, service providers, and others.

NAFA is greatly concerned by the challenges related to the maintenance, repair, and expansion of our nation’s roads and bridges, and welcomes the *INVEST in America Act*’s authorization of $319 billion in federal aid to be distributed to state highway programs to tackle these issues. While NAFA is still in the process of reviewing the various provisions included in H.R. 2, we would like to offer preliminary comments for your consideration on the sections of the legislation identified below.

**SEC. 5402. – National Surface Transportation System Funding Pilot**

NAFA is pleased that H.R. 2 would authorize the establishment of a national vehicle-miles-traveled (VMT) pilot program, and strongly supports testing alternative user-based funding mechanisms to provide for the long-term solvency of the Highway Trust Fund (HTF). The pilot program, as structured in the legislation, seems sound and is considerate of the many...
challenges associated with testing the feasibility of a national-level VMT fee as an alternative to the federal motor fuels excise tax.

However, NAFA believes that a critical component in successfully testing surface transportation funding alternatives is to ensure that public/private stakeholders are highly involved in the development, implementation, and evaluation processes. While the legislation establishes an advisory board, NAFA strongly recommends that minimum representation on the board be extended to local transportation agencies, owners and operators of toll facilities, and fleet operators of light-, medium-, and heavy-duty vehicles from both public and private entities. The advisory board, as written, would only provide for vehicle fleets to be represented by the trucking industry, which is primarily composed of heavy-duty vehicle fleets.

**SEC. 4405. – Underride Protection**

NAFA has many questions about Section 4405, including the provision that would require the regulations for minimum periodic inspection standards and driver vehicle reports to be amended to mandate the presence of rear impact guards and rear end protection to pass inspection. Further, we question the cost-effectiveness of mandating underride guards on newly manufactured trailers and semitrailers. The effectiveness of rear underride guards is challenging to assess. The National Highway Traffic Safety Administration (NHTSA) is best positioned to determine which vehicle categories could reasonably benefit from rear underride guards.

Additionally, NAFA recommends that the Advisory Committee on Underride Protection be expanded to include representatives of fleet managers from both public and private vehicle fleets. Fleet managers are highly involved in developing, assessing, and improving their organization’s vehicle safety program and could provide a wealth of information and expertise as members of the Committee.

**SEC. 1303. – Grants for Charging and Fueling Infrastructure to Modernize and Reconnect America for the 21st Century.**

NAFA would like to reiterate its support for the provisions included in this section to provide grant funding for the installation of electric vehicle charging stations and hydrogen fueling infrastructure along designated corridors across the National Highway System. NAFA also supports the expansion of the legislative provisions to include other types of alternative fueling infrastructure, such as natural gas and liquefied propane gas fueling infrastructure.

NAFA welcomes efforts to further the deployment of alternative fuel vehicle charging and fueling infrastructure. Many fleets choose to purchase alternative fuel vehicles, such as those powered by electricity and natural gas, to comply with sustainability goals and mandates, and because they can also offer additional benefits in increased efficiency and cost-savings. Having access to the necessary infrastructure to operate alternative fuel vehicles is an essential component in the decision-making process for a fleet during its vehicle acquisition process. NAFA believes the creation of an extensive network of interconnected alternative fuel corridors is critical to the commercialization and adoption of advanced alternative fuel vehicle technologies.

**Additional Provisions Under Review**

In addition to the comments above, NAFA and its professional fleet manager members are carefully reviewing additional provisions of H.R. 2, and intend to provide additional comments on the following as the legislative process moves forward.
SEC. 4301. – Applying commercial driver licensing requirements to vehicles carrying 9-15 passengers.
SEC. 4401. – Requiring review of the costs and benefits of requiring lap/shoulder belts in large school buses and to consider requiring seat belts in newly manufactured school buses. Also requiring newly manufactured school buses to be equipped with automatic emergency braking and electronic stability control systems.
SEC. 4404. – Requiring a rulemaking to require Automatic Emergency Braking systems in newly-manufactured commercial motor vehicles.

While reauthorizing funding for surface transportation is an essential first step, NAFA hopes that Congress will continue to examine existing and emerging revenue mechanisms to provide for the sustainable short- and long-term transportation funding. Without adequate revenues, it will become increasingly difficult to appropriate the funds necessary for our nation’s infrastructure. U.S. roads and bridges enable the free flow of goods and people across the nation, and the country’s crumbling roadway system not only endangers the safety of drivers but imposes a significant burden on the U.S. economy.

Again, thank you for advancing surface transportation reauthorization through the INVEST in America Act, and NAFA looks forward to working with you and your staff throughout this process.

Should you or your staff have any questions about NAFA or our policy positions, please do not hesitate to contact me or Patrick O’Connor, NAFA’s U.S. Legislative Counsel, at (703) 351-6222 or patoconnor@kentoconnor.com.

Sincerely,

Bill Schankel
Chief Executive Officer