

**Statement of Michael J. Riley  
President**

MICHAEL J. RILEY  
PRESIDENT

**Motor Transport Association of Connecticut  
Before  
The Joint Committee on Judiciary  
March 14, 2008**

**Re: House Bill No. 670 AN ACT CONCERNING FAILURE TO  
REMOVE SNOW AND ICE FROM A MOTOR VEHICLE IN  
OPERATION**

I am Michael J. Riley, President of Motor Transport Association of Connecticut (MTAC), a statewide trade association, which represents around 1,000 companies that operate commercial motor vehicles in and through the state of Connecticut. Our membership includes freight haulers, movers of household goods, construction companies, distributors, tank truck operators and hundreds of companies that use trucks in their business and firms that provide goods and services to truck owners.

**MTAC OPPOSES THIS BILL**

This bill would impose a fine of \$10 per square foot of snow or ice accumulated on any motor vehicle operating in the state.

The standard trailer used in a tractor-trailer combination is 8.5 feet wide and 53 feet long.

	53.0 Feet Long
X	8.5 Feet Wide
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	450.5 Square Feet
X	\$10 Per Square Foot
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**\$ 4,505.00 Fine**

**For having more than 2 inches of snow on a trailer !**



Aside from the onerous fine, this bill is similar to two other bills which were heard by the Transportation Committee:

- HB 5042 AN ACT CONCERNING THE REMOVAL OF SNOW AND ICE FROM MOTOR VEHICLES.
- SB 298 AN ACT REQUIRING THE REMOVAL OF SNOW AND ICE FROM THE ROOFS OF TRUCKS, TANK VEHICLES, TRACTORS, TRUCK TRACTORS OR TRACTOR TRAILERS UNITS AND FROM THE ROOFS OF TRAILERS OR SEMITRAILERS BEING CARRIED OR DRAWN BY A MOTOR VEHICLE

The removal of snow and ice from trucks is a difficult issue for the trucking industry. We know that it is a problem but there are currently no safe or practical ways for us to remove the snow and ice from the tops of trucks and trailers. Rather than pay fines, for not doing what we cannot do, we have sought help and advice from outside the state.

Since this matter arose, we have been in discussions with officials and staff of American Trucking Associations (ATA), the national trade association of the trucking industry.

Attached is a copy of a letter from Bill Graves, President and Chief Executive Officer of ATA, to Governor Rell on this matter. Graves is a former Governor of Kansas. He also wrote to every member of the General Assembly.

ATA acknowledges that snow and ice on trucks is a problem, not only in Connecticut, but also in other locations throughout the country.

Governor Graves says, "ATA's motor carrier members have struggled to find practical approaches to resolving the problem. While it is relatively easy to remove accumulated snow and ice from most passenger vehicles, it is very difficult to remove snow and ice from trucks."

His letter identifies several challenges which this issue presents to truckers. There are currently no practical methods or technologies which are available to deal with ice and snow on trucks.

However, we know that it is not acceptable for us to just shrug and say there is nothing we can do about it.

So, Governor Graves has decided to ask the American Transportation Research Institute (ATRI) to undertake an effort to identify solutions to this problem. ATRI, a respected research organization dealing with transportation issues, will work with trailer manufacturers, truckers, truck stop operators and others to see what options are currently available. It may be that an effort will be made to develop new ways of dealing with this problem on a long-term basis.

Connecticut should not take lightly the implications of this undertaking. This is the first effort, from a national perspective, to look for a solution to the problem of ice and snow blowing off motor vehicles. This study has been initiated in response to the concerns, which this bill is attempting to address. It will be an earnest effort to solve this problem once and for all.

Therefore, I would respectfully request that the Judiciary Committee not act on Senate Bill 670. Please give the trucking industry a chance to come back with a plan to ensure that snow and ice on motor vehicles is no longer a concern for the motoring public of this country.

Thank you.

**AMERICAN TRUCKING ASSOCIATIONS**950 N. Glebe Road ★ Suite 210 ★ Arlington, VA ★ 22203-4181  
www.truckline.com**Bill Graves**  
President and Chief Executive Officer

March 7, 2008

M. Jodi Rell  
Office of the Governor  
State Capitol  
210 Capitol Avenue  
Hartford, CT 06106-1591

Dear Governor Rell:

The American Trucking Associations<sup>1</sup> (ATA) is writing to comment on the Connecticut General Assembly's efforts to address the issue of snow and ice accumulating on, and sometimes dislodging from, motor vehicles including large trucks. ATA recognizes the accumulation of snow and ice on large trucks and truck-trailers as a problem. We believe it deserves a thorough evaluation beyond the potential enforcement approach being considered in House Bill No. 5042 and Senate Bill No. 298. This issue is not unique to Connecticut, but one that is relevant to all areas of our country affected by harsh and changing winter weather conditions. ATA believes there should be consistency across state lines in addressing the concern.

ATA's motor carrier members have struggled to find practical approaches to resolving the problem. While it is relatively easy to remove accumulated snow and ice from most passenger vehicles, it is very difficult to remove snow and ice from trucks. There are several important considerations related to this issue.

Primarily, there are recognized fall hazards that trucking industry employers must prevent to avoid harm to employees, and to be in compliance with Federal and State OSHA access/egress and walking/working surfaces standards (29 CFR Subparts D and I)<sup>1</sup>. These standards must also be followed by Connecticut public agencies with employees who operate large trucks.<sup>1</sup> First, with respect to large trucks, there are no integrally engineered means of accessing tops of trucks and truck trailers.

<sup>1</sup> The American Trucking Associations is a united federation of motor carriers, state trucking associations, and national trucking conferences created to promote and protect the interests of the trucking industry. Directly and through its affiliated organizations, ATA represents more than 37,000 companies encompassing every type and class of motor carrier in the United States.

<sup>1</sup> See OSHA website <http://www.osha.gov/SLTC/fallprotection/standards.html>.

<sup>1</sup> See OSHA website <http://www.osha.gov/dcsp/osp/stateprogs/connecticut.html>.

**Good stuff.**

Second, trailer roof surfaces are unstable platforms usually made of thin sheet metal or fiberglass and become very slippery with snow and ice. Furthermore, since the trailer roofs are above 6 feet, there would either be a requirement for railings on trailer roofs (that could strike overhead obstructions such as high bridge underpasses), or for the installation of secure anchor points for fall arrest devices, which are not available. As a result of these current limitations, there is a real danger of persons being killed or injured trying to remove snow and ice from trucks and truck trailers.

Snow and ice removal is nearly impossible when trucks are en-route during or after a recent snow or icing event and when trucks stop in remote areas for required rest periods. There are no ready means available to get rid of such buildups.

Technology currently does not allow effective elimination of snow and ice at truck stopover locations (e.g., truck stops, state weigh stations, public rest stops, etc.). For example:

- Fixed, self-clearing gantry brush/squeegee devices generally remove only loose snow; once removed from trailer roofs, the snow piles up on the ground and requires extraction by additional equipment and personnel before the next truck uses the gantry. These devices can also damage roofs creating the delayed possibility of falling or flying trailer roof debris while operating. Damaged roofs would additionally allow water intrusion, which could lead to damaged cargo.
- The operation of private commercial ice and snow removal facilities would not be economically viable. Similar public facilities at weigh stations or public rest areas would be a new budgetary burden for States. These facilities may be needed only five or six times a winter and, when needed, more trucks would want to use the facilities than could possibly be accommodated.
- Effective coatings and integral heat treatment systems, which may aid in eradication of accumulations, have not been made available by truck and trailer manufacturers. Manufacturers would have to be engaged in any effort to resolve this matter.
- Alternatively, removal of snow and ice by truck drivers or other "maintenance" personnel working from scaffold platform towers, ladder stands, or mechanical manlifts expose these persons to additional fall hazards.

In order to reduce the hazard of falling snow and ice from trucks, ATA has asked the American Transportation Research Institute<sup>1</sup> (ATRI) to consider a study to identify feasible options. ATRI's primary mission is to conduct research in the field of transportation, with an emphasis on the trucking industry's essential role in a safe, efficient, and viable transportation system.

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<sup>1</sup> See ATRI's website at <http://www.atri-online.com>.

ATA believes there will be long-term benefits in addressing the problem in a broader and more organized manner prior to enacting a law to which compliance would be nearly impossible. The Motor Transport Association of Connecticut has expressed a high level of interest in working with ATA, ATRI and other state trucking associations on such an endeavor. ATA would welcome the State of Connecticut's participation in this effort as well.

In closing, ATA requests that the Connecticut General Assembly postpone legislative action on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Graves", written in a cursive style.

Bill Graves  
ATA President & CEO

CC: Michael J. Riley, Motor Transport Association of Connecticut