

6/5/85



U.S. Department of  
Transportation

Office of the Secretary  
of Transportation

Docket # OPMO0184  
ITEM # 34

400 Seventh St., S.W.  
Washington, D.C. 20590

JUL 11 1985

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II-A-997

Mr. Charles L. Elkins  
Acting Assistant Administrator  
Office of Air and Radiation (AR-443)  
Docket No. OPMO-0184  
U.S. Environmental Protection Agency  
Washington, D.C. 20460

Dear Mr. Elkins:

In response to the Notice of Proposed Rulemaking contained in the June 19, 1985 Federal Register, we reviewed the proposed rules increasing the stringency of the noise emission standard for medium and heavy trucks manufactured on or after January 1, 1988 and revising the regulation for motor carriers engaged in interstate commerce.

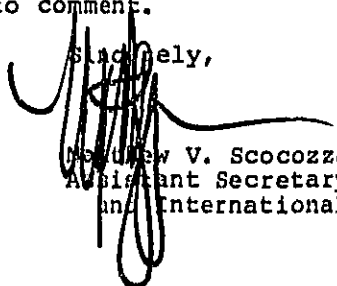
In general, we support the proposed package. We particularly applaud EPA for considering both regulations in complementary fashion. We have no problem with further deferral of the medium and heavy truck standards. However, we do have one concern with respect to the interstate motor carrier regulation.

We note that the overwhelming number of trucks on the highways will comply with the new regulation. In fact, since 1974, the average in-use truck high speed noise levels have been lower than the proposed standard. We would thus favor the regulatory option that would apply the new interstate motor carrier noise standard to all 1978 and later model year vehicles, although we see merit in applying the standard to earlier model year trucks.

While this option might be costly to a relatively small proportion of truck operators, it would provide a greater degree of environmental protection and facilitate enforcement. The draft NPRM contains only qualitative statements on the impact of this option on the trucking industry. This option should be thoroughly examined with respect to its cost effectiveness.

We appreciate the opportunity to comment.

Sincerely,

  
Andrew V. Scocozza  
Assistant Secretary for Policy  
and International Affairs

File: noise

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