



February 2015

# TRANSPORTATION SAFETY

## Federal Highway Administration Should Conduct Research to Determine Best Practices in Permitting Oversize Vehicles

# GAO Highlights

Highlights of [GAO-15-236](#), a report to congressional committees

## Why GAO Did This Study

In May 2013, a truck carrying an oversize load crashed into an interstate bridge in Washington state causing it to collapse. This crash raised issues about oversize vehicles and public safety. DOT develops regulations on vehicle size and weight, and states enforce these standards with some oversight from DOT. States also issue their own regulations on vehicle size and weight and issue permits for oversize and overweight vehicles.

The Joint Explanatory Statement of the Consolidated Appropriations Act for Fiscal Year 2014 required GAO to review the role of federal and state agencies in overseeing oversize vehicles. This report discusses (1) how DOT regulates and provides oversight of oversize vehicles and (2) how states regulate oversize vehicles.

GAO collected information from 50 states and the District of Columbia about their permitting practices; reviewed relevant federal legislation and DOT regulations and documents; and interviewed DOT and state officials from a non-generalizable sample of 10 states, chosen based on a variety of considerations, including geographic diversity and types of permitting requirements.

## What GAO Recommends

GAO recommends that DOT conduct a study on states' oversize- and overweight-permitting practices, including automated vehicle routing and escort driver certification, to identify areas of best practice and share the results with states. DOT agreed with GAO's recommendation and provided clarifying comments, which GAO incorporated.

View [GAO-15-236](#). To view the e-supplement online, click on <http://www.gao.gov/products/GAO-15-235SP>. For more information, contact Susan Fleming at (202) 512-2834 or [flemings@gao.gov](mailto:flemings@gao.gov).

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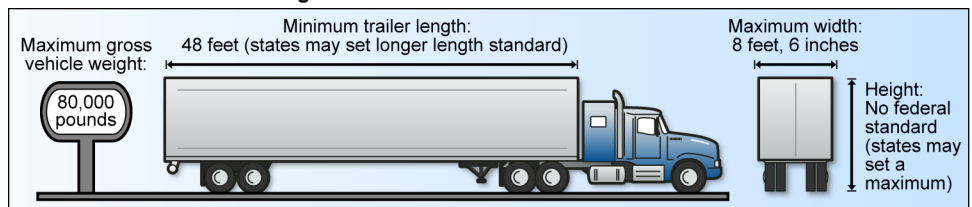
## TRANSPORTATION SAFETY

# Federal Highway Administration Should Conduct Research to Determine Best Practices in Permitting Oversize Vehicles

## What GAO Found

The Department of Transportation's (DOT) Federal Highway Administration (FHWA) has established some federal vehicle size and weight requirements and oversees some state activities. Based on current legislation, FHWA has established rules and regulations for vehicle width, truck trailer length, and vehicle weight standards for certain federal-aid highways aimed at protecting highways and bridges from damage while providing a safe and efficient highway network. FHWA does not, however, have the authority to establish a height requirement, a decision that goes back to the Interstate System's construction in the 1950's, when height clearances already varied from state to state. FHWA also oversees states' processes for enforcing these standards by reviewing states' documentation of enforcement operations. However, FHWA has more limited involvement in individual states' permitting processes and requirements, which the agency considers largely a state matter. For example, it does not provide technical assistance on permitting to states.

### Federal Vehicle Size and Weight Standards



Source: GAO. | GAO-15-236

State laws and regulations set varying size and weight limits and permitting requirements for vehicles that exceed these limits and that operate on highways and bridges. Specifically, GAO found that the vehicle size and weight limits set by state laws and regulations vary by state, although they are within the parameters of federal requirements. For example, states' length standards vary between the minimum federal standard of 48 feet and 65 feet for a semitrailer. GAO also found that permitting practices for oversize vehicles often vary by state. In some cases, states follow similar practices; for example, most states make use of online permitting systems and escort vehicles that travel with an oversize or overweight vehicle. However, other permitting practices vary by state—such as states' use of automated routing systems to provide a route for oversize vehicles. A National Transportation Safety Board investigation reported that differences among states on the various aspects of truck permitting could be a safety concern. State officials GAO interviewed did not always agree on the benefits of the various permitting practices, and some spoke of the need for more information on this topic. While FHWA is (1) conducting some research on the potential effect of changes to truck size and weight limits and (2) working with the trucking industry to update a best practices guide on escort vehicle operations, it has not studied permitting best practices across states due to lack of authority over state permitting. In GAO's prior work on improving agency performance, GAO found that identifying best practices can help identify changes that might be needed to improve performance. By conducting this type of research, FHWA would be better positioned to help states make sound decisions to improve safety and protect infrastructure.

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## Abbreviations

AASHTO	American Association of State Highway and Transportation Officials
D.C.	District of Columbia
DOT	Department of Transportation
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
MAP-21	Moving Ahead for Progress in the 21st Century Act
NHPP	National Highway Performance Program
NHS	National Highway System
NTSB	National Transportation Safety Board
SC&RA	Specialized Carrier and Rigging Association

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February 26, 2015

The Honorable Susan Collins  
Chairman  
The Honorable Jack Reed  
Ranking Member  
Subcommittee on Transportation, Housing  
and Urban Development and Related Agencies  
Committee on Appropriations  
United States Senate

The Honorable Mario Diaz-Balart  
Chairman  
The Honorable David Price  
Ranking Member  
Subcommittee on Transportation, Housing  
and Urban Development and Related Agencies  
Committee on Appropriations  
House of Representatives

On May 23, 2013, a truck carrying a permitted oversize load crashed into the Skagit River Bridge on Interstate 5 in the State of Washington, causing a portion of the bridge to collapse and raising questions about permitting practices for oversize loads. A National Transportation Safety Board (NTSB) investigation of the Skagit River bridge collapse reported that differences among states and regions on the various aspects of truck permitting could be a safety concern. This incident in Washington not only injured three people but also disrupted traffic in an important freight corridor for nearly 4 weeks while the bridge was closed. The bridge repair cost \$8.5 million in federal-aid highway funds. The Department of Transportation's (DOT) Federal Highway Administration (FHWA) provides about \$40 billion each year to states to build, improve, and preserve the nation's road and bridge infrastructure through the federal-aid highway program. DOT's Federal Motor Carrier Safety Administration (FMCSA) also provides over \$300 million each year to state and local government agencies in grants for commercial motor vehicle safety activities.

While federal funding is provided to state and local governments to help improve highway infrastructure and support commercial vehicle safety activities, states own and maintain most of the nation's highways and bridges. As a part of that effort, states develop regulations for vehicle size and weight to be enforced in their state (subject to certain federal limits)

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and issue permits that allow motor carriers to operate oversize and overweight vehicles, for example to deliver manufactured housing or to move heavy construction equipment to a job site.<sup>1</sup> The Joint Explanatory Statement accompanying the Consolidated Appropriations Act for Fiscal Year 2014 directed GAO to review the oversight of oversize loads and the role of federal and state agencies in that process. This report examines (1) how DOT regulates and provides oversight of oversize vehicles and loads on highways and bridges, and (2) how state agencies regulate oversize vehicles and loads on highways and bridges.

To determine how DOT regulates and provides oversight of oversize vehicles and loads on highways and bridges, we reviewed relevant legislation, regulations, and FHWA and FMCSA program documents and interviewed FHWA and FMCSA officials. We also interviewed representatives from national transportation organizations and the trucking industry, such as the American Association of State Highway and Transportation Officials (AASHTO), the Commercial Vehicle Safety Alliance, and the Specialized Carrier and Rigging Association (SC&RA). For context, we reviewed NTSB documents on the Interstate 5 bridge collapse in Washington State, attended an NTSB Board meeting on the bridge collapse, and interviewed NTSB officials and investigators who work on highway safety. To determine how state agencies regulate oversize vehicles and loads on highways and bridges, we reviewed commercially available information on states' vehicle size requirements, developed and administered a data-collection instrument to officials from 50 states and the District of Columbia, and interviewed state officials from a non-generalizable sample of 10 states—Iowa, Maine, Nebraska, New York, Pennsylvania, South Dakota, Tennessee, Texas, Washington, and Wisconsin.<sup>2</sup> This report does not contain all the results from the data-collection instrument, which can be viewed at [GAO-15-235SP](#). We selected states to interview based on nationwide geographic dispersion, state involvement in regional permitting consortiums, variations in permitting requirements, use of online permitting, and crash and enforcement data availability. To determine how permitting practices could be improved, we used our prior work on key steps agencies should

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<sup>1</sup>Motor carriers may also need to obtain permits for circumstances other than oversize or overweight loads, such as the transport of hazardous materials, which we do not address in this report.

<sup>2</sup>When we refer to states in this report, we are including the District of Columbia.

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take to improve performance as criteria and compared existing practices to those of leading organizations.<sup>3</sup> Appendix I contains more detailed information on our scope and methodology.

We conducted this performance audit from April 2014 to February 2015 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

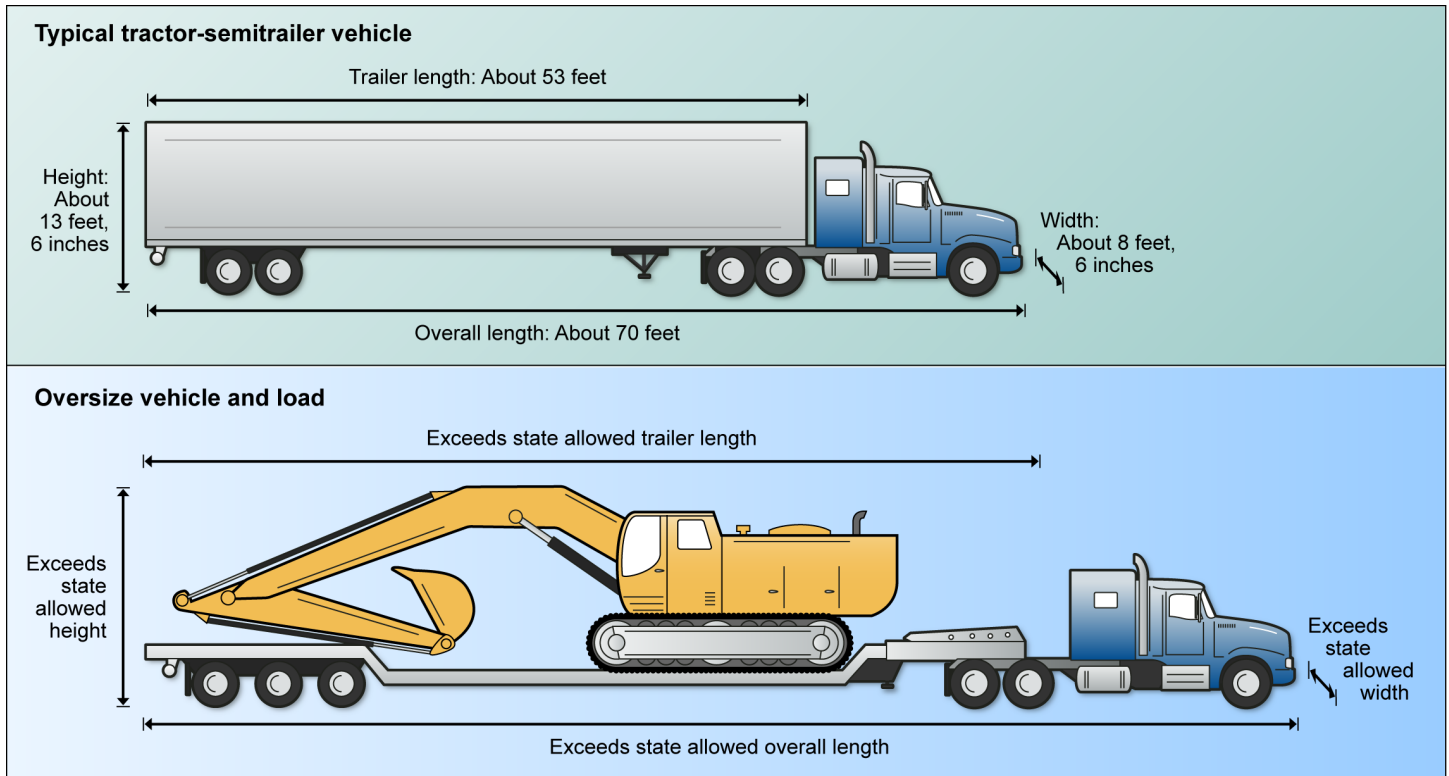
Commercial vehicles and loads are generally of a size and weight that allows them to freely travel on our nation's highways; however, some are too large or too heavy (or both) to operate on a highway without posing a safety risk or potentially damaging highway infrastructure. A vehicle and load is considered oversized when the vehicle and the cargo it carries exceed the legal dimensions of length or width, as defined by federal requirements or length, height, or width as defined by state requirements for the state in which the vehicle will be traveling (see fig. 1). A vehicle and load is considered overweight when the vehicle and the cargo it carries exceed the legal weight limit as defined by federal and state requirements.<sup>4</sup>

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<sup>3</sup>GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1996). To identify key practices we reviewed the experiences of leading public organizations that were successfully changing their practices to be more results-oriented. To supplement our work looking at leading organizations, we identified and reviewed literature on management reform, strategic planning, and performance measurement. See [GAO/GGD-96-118](#) for additional details.

<sup>4</sup>Requirements may be based on either per axle, two or more closely spaced axles, tandem axle, Federal Bridge Formula, or gross vehicle weight.

**Figure 1: Typical and Oversize Vehicles and Loads**



Source: GAO. | GAO-15-236

When vehicles and loads exceed federal or state size and weight limits, carriers are generally required to reduce the size of the load to within the limits, if possible. Specifically, carriers must divide oversized or overweight loads of bulk goods such as corn, gravel, or mail into smaller loads unless they have special exceptions.<sup>5</sup> However, some non-divisible oversized or overweight loads, such as sections of wind turbine towers, may receive permits to travel on a highway, if they can be safely transported without damaging pavements or bridges as determined by state requirements (see fig. 2).

<sup>5</sup>Designated divisible load permits may be issued by the state based upon historic state "grandfather" rights for a state-specific commodity or route movement at a greater size or weight or through congressional action. See: 23 C.F.R. §§ 658.5, 658.23(d), and Appendix C to Part 658.



**Figure 2: Non-divisible Oversize and Overweight Load—Section of Wind Turbine Tower**



Source: Maine Department of Transportation. | GAO-15-236

Moving these types of large, non-divisible loads—such as manufactured housing, construction equipment, and wind turbine towers—is necessary for interstate commerce; however, such actions can create inconveniences and hazards, including the following:

- *Traffic congestion:* Oversize and overweight vehicles can create traffic congestion when they 1) travel at a slow speed to reduce risk of damage to bridge infrastructure, 2) are extremely wide and block multiple traffic lanes, or 3) are so long that entire intersections must close to accommodate them. For example in March 2014, a vehicle carrying an oversize and overweight electronic transformer in Arizona could only travel at 10 miles per hour, thus requiring the closure of a portion of Interstate 10 to complete its journey.
- *Infrastructure damage:* High, wide, or long oversize loads can damage or destroy infrastructure like bridges, overhead signs, traffic signals, and utilities when there is not enough clearance and they strike them. Bridges can be susceptible to damage from oversize loads, not only on the bridge roadway, where there may be insufficient clearance from overhead bridge beams, as with the Skagit River bridge in Washington State, but also for roads passing under a bridge where there is insufficient clearance from the road surface below to the underside of the bridge.

- *Pavement and bridge damage:* Overweight vehicles and loads can damage or contribute to the failure of pavement and bridges not designed to sustain the weight of the vehicle and load. For example, in June 2014 a self-propelled crane that was overweight by 90,500 pounds (total weight of 170,500 pounds) and traveling without a permit in Kingwood Township, New Jersey, caused a steel-truss bridge to collapse on County Route 519 (see fig. 3). The estimated cost to replace the bridge is \$2,300,000.
- *Injuries:* Oversize and overweight loads can cause injuries to others. For example, in 2000 an oversize and overweight piece of oil refinery equipment being transported in Glendale, California, missed a turn on its planned route and became stuck on railroad tracks it had not intended to cross. It was subsequently hit by a commuter train, injuring five people and causing over \$2 million in damage.

**Figure 3: County-Road Bridge Collapse**



Self-propelled 170,500 pound crane traversing the bridge when it collapsed

Truck following overweight vehicle after bridge collapsed

Source: Hunterdon County New Jersey Department of Public Works. | GAO-15-236

To mitigate possible hazards and inconveniences, state and local agencies require permits for oversize or overweight vehicles and loads that travel on highways and some local roads. A permit is issued by a state to provide permission for an oversize or overweight vehicle and load to travel in an area, for example a state or town, or on a specific route,

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such as an interstate highway.<sup>6</sup> When state agencies issue permits, they may assess the possible negative impacts the oversize or overweight load and vehicle may cause, and then they may try to mitigate those impacts by attaching conditions to the permit such as the time of day during which travel is allowed, the number or spacing of the vehicle's tires to distribute the weight of the load, the speed that the load can travel, or the use of warning signs and lights, among others. A carrier transporting an oversize or overweight vehicle and load from one part of the United States to another will usually have to obtain permits from multiple permitting authorities, each with different permitting requirements.<sup>7</sup>

Federal and state agencies regulate and enforce vehicle size and weight requirements in the United States.

- *Federal agency:* FHWA provides stewardship and oversight over the federal-aid highway program which supports the design, construction, operation, management, and preservation of the nation's highways, bridges and tunnels. FHWA also conducts research and provides technical assistance to state and local agencies in an effort to improve safety and mobility, and to encourage innovation. As a part of that stewardship, FHWA's Office of Freight Management and Operations develops federal regulations for the implementation of statutory requirements for commercial vehicle size and weight. FHWA also oversees the states enforcement of those regulations. Staff in each of FHWA's 52 Division Offices assists the Office of Freight Management and Operations as a liaison with their respective state transportation agencies on size and weight oversight functions, among other duties.<sup>8</sup>
- *State agencies:* States develop vehicle size and weight requirements to be enforced in their state (incorporating the federal standards), review permit applications and issue oversize and overweight permits, and enforce the federal and state vehicle size and weight regulations.

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<sup>6</sup>In some cases, local agencies and other governmental authorities issue permits; however, in this study we only reviewed permits being issued by state agencies due to their direct relationship with FHWA in the enforcement of federal standards and administration of federal-aid highway funding.

<sup>7</sup>In some cases, there are multistate consortiums from which carriers may obtain permits for an entire route that crosses state lines.

<sup>8</sup>FHWA has Division Offices in the 50 states, the District of Columbia, and Puerto Rico. We did not include Puerto Rico in our study.

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State Departments of Transportation typically review permit applications and issue permits. The state's law enforcement agency is typically responsible for enforcing state laws and regulations pertaining to vehicle size and weight, including the requirements of oversize and overweight permits.

State associations and industry groups also have an interest in the safe and efficient movement of oversize and overweight vehicles and participate in the regulation and enforcement processes. For example, the American Association of State Highway and Transportation Officials (AASHTO), which represents state highway and transportation departments, develops voluntary standards for many aspects of the national transportation system. AASHTO is currently working on an effort to standardize or "harmonize" some permit requirements among the states to make the movement of freight as efficient as possible without compromising safety or endangering infrastructure. Phase One of AASHTO's harmonization efforts was agreed to in March 2014, and Phase Two efforts are in discussion. Additionally, the Specialized Carriers and Rigging Association (SC&RA), an organization that represents carriers transporting oversize and overweight loads, works to ensure the safe and profitable transport of oversize and overweight loads.

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**FHWA Has Established Some Federal Vehicle Size and Weight Requirements, Oversees State Enforcement, and Provides Some Assistance to States**

FHWA has established some federal vehicle size and weight requirements, collects some information on state enforcement practices, and provides some technical assistance to states related to truck size and weight issues.

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## FHWA Has Established Some Federal Size and Weight Requirements for Vehicles

Federal laws and FHWA regulations establish standards for vehicle width, weight, and length on some of the nation's highways.

- Width and weight standards are set at maximums. The width standards generally require states to allow vehicles to be up to, but not exceed, 8 feet 6 inches wide (see fig. 4).<sup>9</sup> Similarly, the weight standards generally require states to allow vehicles to be up to, but not exceed, 80,000 pounds in total vehicle weight.<sup>10</sup> States cannot set lower width or weight maximums when these federal standards apply. Vehicles exceeding these width and weight standards are considered overwide or overweight.
- The federal length standards differ from the above width and weight standards in that they do not establish a maximum overall length for a vehicle. The length standard is a minimum standard set to ensure interstate commerce is not impeded by a state's requirements. The regulation provides only that states may not require permits for vehicles with trailers that are less than a specific length, which depends on the type of vehicle. For example, states cannot require trucks with a single trailer to obtain a permit for a trailer that is less than 48 feet.<sup>11</sup> However, states may allow longer vehicles or trailers to travel without requiring a permit.

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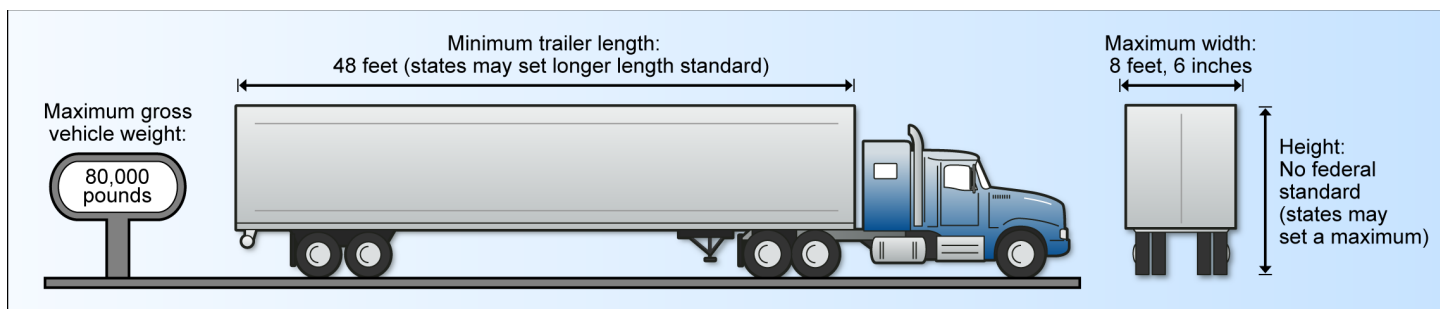
<sup>9</sup>49 U.S.C. § 31113.

<sup>10</sup>Federal size laws are found in the U.S. Code (U.S.C.), 49 U.S.C. §§ 31111, 31112, 31113, and 31114 and the implementing regulations are in 23 C.F.R. Part 658. Federal weight laws are codified in 23 U.S.C. § 127 and implemented in Part 658. A state is subject to withholding of 50 percent of its National Highway Performance Program (NHPP)—a program which primarily supports the construction and improvement of the National Highway System (NHS)—federal-aid highway funds by the Secretary of Transportation if a state's laws or regulations establish weight limits for commercial motor vehicles operating on the Interstate Highway System which are either higher or lower than the 80,000 pounds maximum gross vehicle weight, unless otherwise excepted by federal regulations. 23 U.S.C. §127(a)(1). States individually received between \$90 million and \$2 billion dollars in NHPP funding for fiscal year 2014.

<sup>11</sup>This length standard is for trucks with one trailer. Twenty-eight states are required by a grandfathering clause in federal regulations to allow trucks with one trailer to be in excess of the 48-foot requirement based on the trailer length at which the trucks were being lawfully operated in the state as of December 1, 1982. 23 C.F.R. § 658.13. Additional federal length standards exist for commercial trucks with two trailers, three trailers, or specialized equipment such as automobile and boat transporters. 23 C.F.R. §§ 658.13 and 658.23.

According to FHWA officials, federal length and width standards are set to enhance interstate commerce by ensuring carriers can travel from state to state without undue restrictions on vehicle size. Maximum width standards are set to minimize infrastructure damage and assure safe traffic operations, and maximum weight standards are primarily to protect highways and bridges from damage from excessive weight and to assure safe traffic operations.<sup>12</sup>

**Figure 4: Federal Vehicle Size and Weight Standards**



Source: GAO. | GAO-15-236

FHWA’s federal vehicle width, length, and weight regulations apply to a small percentage of the nation’s highways. There are approximately 4,093,000 total miles of public highways and roads in the United States, and federal size and weight standards apply to designated highways of national importance, as shown in figure 5. The National Network connects cities on highways capable of safely handling larger commercial vehicles for interstate commerce. FHWA’s vehicle size (width and length) regulations apply to the entire 200,000 miles in the National Network,<sup>13</sup> which includes the Interstate System,<sup>14</sup> while the weight regulations apply to the 47,000-mile Interstate System, and not the larger National

<sup>12</sup>There are exceptions to the federal standards based on grandfathering and other exclusions. For example, the width limits do not apply to military, farm, construction, or fire emergency equipment. 23 C.F.R. §§ 658.15(b) and 658.5.

<sup>13</sup>These regulations also apply on routes providing reasonable access to and from the National Network. 23 C.F.R. § 658.19.

<sup>14</sup>The Interstate System connects metropolitan areas, cities, and industrial centers; serves national defense purposes; and connects routes of continental importance.

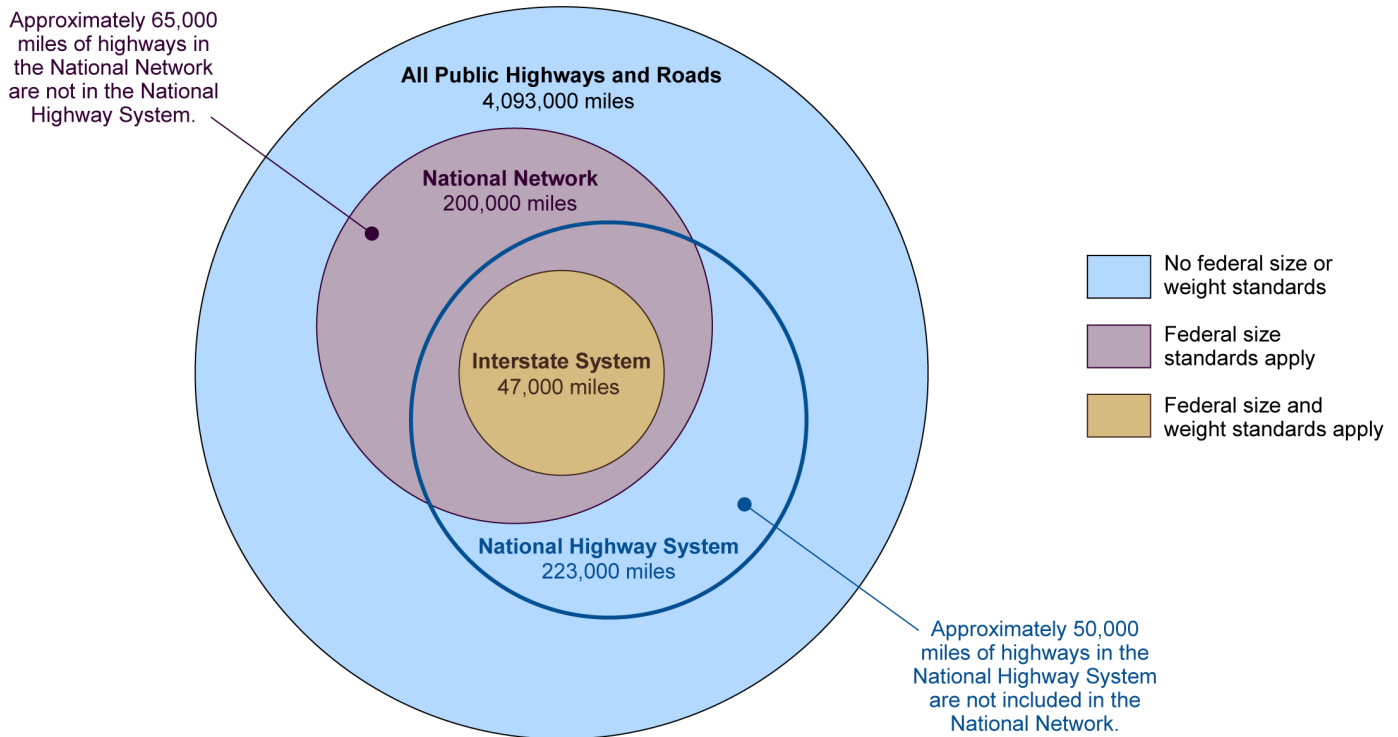
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Network.<sup>15</sup> Also, the National Highway System (NHS)—those highways important to the nation’s economy, defense, and mobility—is supported with improvement projects funded by almost \$22 billion in federal-aid highway funds in fiscal year 2014. The federal size and weight regulations do not apply to about 50,000 miles of the 223,000 miles of the NHS. Therefore, size and weight regulations are applied differently and not on all types of federal highways. The federal size regulations apply to less than 5 percent, and the federal weight regulations apply to a little over 1 percent, of the over 4 million miles of public highways and roads.

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<sup>15</sup>Federal vehicle size standards apply to the National Network, which was authorized by the Surface Transportation Assistance Act of 1982 (Pub. L. No. 97-424, §411, 96 Stat. 2097, 2159) and specified in the Code of Federal Regulations (23 C.F.R. Part 658). The National Network differs in extent and purpose from the National Highway System (NHS). The National Network is a system of highways that are capable of safely accommodating larger commercial motor vehicles and regulated to support interstate commerce, while the NHS supports interstate commerce by focusing federal investments.

**Figure 5: Highway Miles Subject to Federal Size and Weight Standards by Highway System, 2012**



Source: GAO presentation of FHWA data. | GAO-15-236

Note: All mileages are approximate. The National Network is a system of highways that are capable of safely accommodating larger commercial motor vehicles and regulated to support interstate commerce, while the National Highway System (NHS) supports interstate commerce by focusing federal investments. The Moving Ahead for Progress in the 21st Century Act (MAP-21), Pub. L. No. 112-141, §1104, 126 Stat. 405, 422) in 2012, redefined the NHS, increasing its size. While the NHS mileage is as of 2012, the mileages shown for the two areas within the National Network or NHS where the National Network and the NHS do not overlap is pre-MAP-21 and has not yet been updated by FHWA.

States can set their own size and weight standards where a federal standard does not apply to a certain highway, which can be either more or less restrictive than the federal standards, depending on the type of standard. For example, while the State of Michigan follows the federal width standard (8 feet 6 inches) for vehicles on the highways covered by federal regulations or on special state-designated highways, on all other highways, a truck’s width cannot exceed a more restrictive state standard of 8 feet 0 inches. Conversely, New York is less restrictive on trailer lengths and allows 53 feet 0 inch long trailers—five feet longer than the minimum length states must allow on highways covered by federal regulations.



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Further, federal standards have not been established for all aspects of vehicle size allowed on certain highways of national importance. Specifically, Congress has not set a vehicle height requirement, nor given FHWA the authority to do so, for any federal highway. FHWA officials said that the decision to not have a federal height standard goes back to a decision made in the 1950's when the Interstate System was being constructed and the height clearances already varied from state to state. All states have set a maximum height at, or above, the standard semi-trailer height of 13 feet- 6 inches. In addition, while there are weight standards for the almost 47,000 mile Interstate System, there are no federal weight standards for the approximately 176,000 miles of highways on the federally important NHS and 153,000 miles of the National Network that are not on the Interstate System, as mentioned earlier. As a result, states determine the maximum truck height, length, and weight allowed and when a permit is required for these highways. Given these limits in federal standards for vehicle size and weight, states have the flexibility to set their own standards; however, as shown in the following sections, this flexibility results in a variance from state to state.

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### FHWA Oversees State Enforcement and Provides Some Assistance

In addition to establishing size and weight standards, FHWA oversees some state activities related to oversize and overweight vehicles and loads. FHWA's Office of Freight Management and Operations in Washington, D.C., and staff in each of FHWA's 52 Division Offices are responsible for communicating with states on federal standards regarding vehicle size and weight. FHWA requires states to prepare and submit an annual Truck Size and Weight Certification (Certification) and State Enforcement Plan.<sup>16</sup> FHWA Division Offices are to review these documents to verify that each state is enforcing vehicle size and weight laws, and that state laws do not conflict with federal laws. Further, based on these documents and review of the states' size and weight enforcement operations, the division offices are to prepare an evaluation report for each state. If states do not provide their annual certification, or the Secretary of Transportation (Secretary) determines that a state is not adequately enforcing all state laws on the Interstate System and other federal-aid routes, then the Secretary can withhold 7 percent of that

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<sup>16</sup>Truck Size and Weight Certification and State Enforcement Plan regulations are found in the Code of Federal Regulations (CFR), 23 C.F.R. Part 657.

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state's federal-aid highway funding<sup>17</sup> while the state is given an opportunity to come into conformity with federal regulations or appeal the Secretary's decision.<sup>18</sup> If the state fails to certify, or the certification is rejected and the state's appeal process is exhausted, the Secretary is required by law to redirect the 7 percent of the state's federal funding previously withheld to other states.<sup>19</sup> FHWA officials stated that they and state officials work together to correct problems with the certifications to avoid withholding funding from states and, as a result, have not withheld or redirected funding from any state since fiscal year 1992.<sup>20</sup>

FHWA also conducts research and provides technical assistance related to truck size and weight issues. For example, as required by MAP-21, FHWA has a new study on comprehensive truck size and weight limits under way.<sup>21</sup> Among other things, this study is to examine the impact of a change to current federal truck size and weight limits on highway safety and infrastructure damage. Also, in June 2013, FHWA issued guidance for states on implementing special permits during periods of national

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<sup>17</sup>Funding under the NHPP, Surface Transportation Program, Highway Safety Improvement Program, Congestion Mitigation and Air Quality Improvement Program, and Metropolitan Planning Program can be withheld.

<sup>18</sup>23 C.F.R. § 657.21.

<sup>19</sup>23 C.F.R. § 657.19. In addition, under 23 U.S.C. § 141(b)(3), "If within one year from the date that the apportionment for any State is reduced in accordance with paragraph (2) of this subsection the Secretary determines that such State is enforcing all State laws respecting maximum size and weights, the apportionment of such State shall be increased by an amount equal to such reduction. If the Secretary does not make such a determination within such one-year period, the amounts so withheld shall be reapportioned to all other eligible states."

<sup>20</sup>FHWA officials stated that 1992 is the first fiscal year that they began keeping electronic records on withholding of apportionments as outlined in 23 C.F.R. § 657.21 due to non-compliance with 23 U.S.C. § 141.

<sup>21</sup>Pub. L. No. 112-141, § 32801, 126 Stat. 405, 816 (2012). MAP-21 is the current authorization act for surface transportation programs and expired at the end of fiscal year 2014. Programs and budget authority authorized by MAP-21 were extended to May 31, 2015. Pub. L. No. 113-159, § 1001(a), 128 Stat. 1839, 1840 (2014). Among other things, section 32801 of MAP-21 required DOT to conduct a comprehensive truck size and weight limits study addressing differences in safety risks, infrastructure impacts, and the effect on levels of enforcement between trucks operating at or within federal truck size and weight limits and trucks legally operating in excess of federal limits.

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emergencies as set out in on MAP-21.<sup>22</sup> Additionally, FHWA in cooperation with the trucking industry and the Commercial Vehicle Safety Alliance funded the development of pilot car escort and law enforcement escort best practices guides in 2004. FHWA officials told us that they are planning to provide staff support to update the pilot car escort best practices guide including providing research on stakeholder-identified priority areas, such as vehicle operations.<sup>23</sup> Finally, federal-aid highway funds administered by FHWA can be used by states in constructing some infrastructure, such as weigh stations, to enforce weight standards.

FHWA's policy is to provide a safe and efficient highway network that can accommodate large vehicles, but FHWA plays a limited role in permitting oversize and overweight vehicles for several reasons. While FHWA's regulations establish standards for vehicle size and weight, according to FHWA officials, FHWA lacks the statutory authority to establish any requirements for state permitting. According to these officials, permitting practices are largely a state matter, and thus they do not keep records of states' permitting requirements or provide technical assistance on permitting to states. Officials from the 10 states we interviewed told us that the federal government provides them with little or no guidance on permitting. However, state transportation agencies—through their membership in AASHTO—have efforts under way to harmonize size and weight requirements and conditions under which they issue oversize and overweight vehicle permits. FHWA assists in an advisory role in this effort. FHWA officials told us that states are now working on changes to state administrative rules in order to harmonize requirements.

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<sup>22</sup>Federal Highway Administration, *Information: MAP-21, Section 1511—Special Permits During Periods of National Emergency Implementation Guidance, Revised* (Washington, D.C.: June 5, 2013).

<sup>23</sup>Pilot car escort operations include the duties and responsibilities associated with the use of a vehicle in advance of or following an oversize vehicle and load as it moves along a highway by providing warnings to other motorists, ensuring safe movement, and ensuring that sufficient clearances exist for the load and vehicle to complete its transit.

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## States Set Varying Vehicle Size and Weight Laws, and Issue Permits with Different Permit Requirements

States have varying laws and requirements that carriers must follow when operating vehicles on highways and bridges. Specifically, we found that states vary on vehicle size and weight laws, on state practices to issue and enforce permits for oversize and overweight vehicles, and on other state permitting requirements, as described below.

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## States Set Varying Vehicle Size and Weight Requirements

All 50 states and the District of Columbia (D.C.) have state laws or regulations, based on applicable federal regulations, that set size and weight limits for vehicles operating in that state. Maximum vehicle width and weight requirements are generally set at the federal standard (8 feet 6 inches wide and 80,000 pounds for gross vehicle weight).<sup>24</sup> However, states have varying size requirements for vehicle length and height.<sup>25</sup> For example, 37 states set 53 feet 0 inches as the maximum legal length for a semitrailer,<sup>26</sup> and length limits for the remaining 13 states and D.C. vary from 48 feet 0 inches to 65 feet 0 inches. Further, 29 states and D.C. set maximum vehicle height at 13 feet 6 inches, while the other 21 states allow vehicles to be from 14 feet 0 inches to 15 feet 0 inches. (Table 1 below summarizes vehicle size and weight requirements in the 50 states and D.C.<sup>27</sup>)

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<sup>24</sup>Hawaii allows a width of 9 feet and Illinois allows 8 feet on most highways and roads. Three states allow loads heavier than 80,000 pounds on most highways and roadways: Maine, Washington, and Wyoming.

<sup>25</sup>As previously discussed, FHWA standards on vehicle length provide a minimum length that states may not restrict below, but not a maximum vehicle length.

<sup>26</sup>A semitrailer is defined as a tractor trailer combination in which there is one trailer.

<sup>27</sup>We gathered information about vehicle size and weight requirements and other permitting practices in the 50 states and the District of Columbia. This information was confirmed by state and D.C. officials as a data reliability check. See appendix I for information on our methodology for gathering and analyzing this information.

**Table 1: Summary of Vehicle Size and Weight Requirements in the 50 States and the District of Columbia**

Type of requirement	Description
Maximum width for a legal vehicle	<ul style="list-style-type: none"> <li>49 set maximum width at 8 feet 6 inches, which is the federally mandated standard.</li> <li>1 sets maximum width at 8 feet 0 inches, and another sets it at 9 feet 0 inches.</li> </ul>
Maximum weight for a legal vehicle	<ul style="list-style-type: none"> <li>48 set maximum gross vehicle weight at 80,000 pounds, which is the federally mandated standard.</li> <li>3 set higher gross vehicle weight limits.</li> </ul>
Maximum length for a legal semitrailer	<ul style="list-style-type: none"> <li>37 set maximum length at 53 feet for a semitrailer.</li> <li>Maximum lengths vary between the minimum federal standard of 48 feet and 65 feet for a semitrailer.</li> <li>Maximum length requirements vary for other types of vehicles, depending upon the number of trailers, the type of load, and the type of highway traveled.</li> </ul>
Maximum height for a legal vehicle	<ul style="list-style-type: none"> <li>30 set maximum height at 13 foot 6 inches.</li> <li>21 have at least a 14 foot height maximum, including Alaska, with the highest at 15 feet.</li> </ul>

Source: GAO analysis of state reported data. | GAO-15-236.

Note: Data we collected on the 50 states and the District of Columbia are available in the accompanying e-supplement, [GAO-15-235SP](#).

According to an AASHTO representative and state officials, such differences across states occur due to several factors, including age of infrastructure and changes to bridge clearance requirements over time. For example, Tennessee officials stated new bridges in Tennessee on the NHS are designed for a minimum vertical clearance of 16 feet 6 inches, while bridges on other routes have a minimum clearance of 14 feet 6 inches. Additionally, some standards were established in states a number of years ago and current state DOT staff may not know why they were established. For example, New York officials stated that a number of their requirements have been in place for decades and that officials do not know how they were determined, although carriers may have provided some input.

## States Issue and Enforce Permits, and Practices Differ By State

States also administer differing processes to issue and enforce permits for vehicles that exceed their size and weight limits, and determine varying requirements that permitted vehicles must follow, as described below. Table 2 below summarizes these processes in the 50 states and D.C.

**Table 2: Summary of Permit Processes for Oversize and Overweight Vehicles in the 50 States and the District of Columbia**

Permit processes	Description
Permit issuing agency	<ul style="list-style-type: none"> <li>32 issue permits from Departments of Transportation.</li> <li>In other states, Departments of Motor Vehicles, Departments of Revenue, or others, issue permits.</li> </ul>
Permit system	<ul style="list-style-type: none"> <li>45 offer online permit applications.</li> </ul>
Automated routing system	<ul style="list-style-type: none"> <li>23 offer automated truck routing.</li> </ul>
Escort vehicles	<ul style="list-style-type: none"> <li>44 may require escort vehicles above a certain height.</li> <li>51 may require escort vehicles beyond a certain width.</li> </ul>
Certification of escort vehicle drivers	<ul style="list-style-type: none"> <li>38 do not require certification for escort vehicle drivers.</li> </ul>

Source: GAO analysis of state reported data. | GAO-15-236.

Note: Data we collected on the 50 states and the District of Columbia are available in the accompanying e-supplement, [GAO-15-235SP](#).

- Permit Issuing Agency:* State governments issue most oversize and overweight permits; however, some local governments may also issue permits when carriers travel through local jurisdictions. State Departments of Transportation are often responsible for issuing permits. For example, states reported that state DOTs issue permits in 31 states and D.C. Permits can also be issued by state law enforcement, as in South Dakota, where South Dakota Highway Patrol Officers, trained in oversize and overweight enforcement, issue all state permits. In other states, the Department of Revenue or Department of Motor Vehicles may be the agency to issue permits. The number of permits issued annually varies greatly among states. For example, Texas issued the highest number of oversize permits in fiscal year 2013, around 400,000, while D.C. issued the fewest oversize permits, around 2,000. Trends in the number of permits issued vary from state to state, according to state officials we interviewed. Officials from one state described large increases in the number of permits issued, citing wind towers and oil industry activities as contributing factors, while another state described fluctuation in the number of permits issued, but no general increase.
- Oversize and Overweight Permit Types:* States reported offering differing permit types that can allow oversize or overweight vehicles to operate within a state or between states. For example, Maine has 2 types of permits, whereas Pennsylvania offers 96. Some states differentiate between vehicle sizes to determine permit type and fees, while others create specialty permits based on industry. For example,

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Washington has a special permit type for vehicles transporting empty apple containers, and Texas has a special permit type for water well drilling machinery and equipment. States may also allow carriers to apply for a regional permit that allows carriers to apply one time and obtain permits for a trip on designated highways across multiple states. However, the size and weight requirements for a regional permit differ between regions, and 22 states reported that they do not participate in any regional agreement.<sup>28</sup>

- *Permit System:* Permits may be issued by online- or manual-permitting systems, and the type of review can differ for each system. For example, online systems allow carriers to apply online, and some may issue permits without review from a permitting official for certain oversize or overweight vehicles traveling on established routes. For manual systems, state officials process permit requests, which can require face-to-face or phone contact. Overall, 44 states and D.C. reported offering online applications for permits, yet not all of these states automatically issue permits, and many such issued permits are for specific sizes and weights or specific routes. In some cases, states may need to work with carriers to find alternative routes in cases when permit applications are denied. State officials and others have varying opinions on the advantages of online permitting systems. For example, Tennessee officials said that some form of manual permitting was the safest option, while South Dakota officials said that online systems improved safety by removing human clerical error. Texas officials said that either way, they could not manually review all permit applications, because there are too many requests. Further, in its *Accident Report on the Collapse of the Interstate 5 Skagit River Bridge*, NTSB noted that a permitting process that enables a carrier to self-issue a permit online, without engaging the state in a technical review, does not motivate carriers to conduct surveys of the route to be traveled before transporting oversize loads even if a survey is required.
- *Automated Routing System:* Automated routing systems use clearance databases updated by state officials to provide a route to

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<sup>28</sup>The Western Regional Permit allows a carrier to transport a vehicle and load up to 160,000 pounds across many western states. The Southern Regional Permit allows a gross vehicle weight of 120,000 pounds. The New England Transportation Consortium was begun in 1985 to facilitate travel in five states, but now operates as a bilateral agreement between Maine and New Hampshire.

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carriers. Twenty-three states reported they currently have automated vehicle routing capabilities. Officials in 8 out of the 10 states interviewed told us that automated routing systems could improve safety by removing human error or increasing compliance; however, 4 of the 10 states we interviewed currently offer automated routing. For example, South Dakota officials stated that their automated routing system was a benefit because it reduces the error rate while improving efficiency, safety, and carrier compliance. Additionally, Maine officials told us that while they do not have the capability, automated routing could make permit processing faster and more error-free. Not all of the states we interviewed agreed that automated routing would improve safety. For example, while Washington State officials are considering the development of automated routing, they do not see automated routing as a tool to increase safety. Additionally, Pennsylvania officials stated a primary benefit of automated routing systems would be ease of use for carriers.

- *Permit Enforcement:* States enforce compliance with permitting rules and regulations differently. For example, state officials we interviewed said they use roadside enforcement, administrative enforcement, or both to issue civil penalties or fines. Roadside enforcement generally involves law enforcement officers stopping an oversize or overweight vehicle and load to check for permits and compliance with state and local requirements. States may focus enforcement operations at fixed locations, such as at major border crossings or operate with mobile enforcement units, or both. According to state officials interviewed, the technology used in roadside enforcement can vary from yardsticks to sophisticated laser-measuring tools. For example, Texas officials told us that they use laser measuring systems with weigh-in-motion detection while Nebraska state officials said they physically measure vehicles with tape measures and traditional weight scales. Administrative enforcement can involve a review of permit documentation, a review of citations, or a review of carrier records collected by the state. State officials may review their records to identify carriers with numerous safety or permit violations. For example, Wisconsin permit officials told us they could enforce restrictions on repeat violators, shutting down their operation in the state by refusing to issue permits or by suspending licenses.
- *Escort vehicles:* Escort vehicles travel with an oversize or overweight vehicle and load to help protect the traveling public and infrastructure. The use of escort vehicles is widespread among states, though at different height and width thresholds. For example, 43 states and D.C. reported that they require escort vehicles for overheight vehicles and



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loads, although what is considered an overheight vehicle and load varies among states. All 50 states and D.C. reported that they require escort vehicles for overwidth vehicles and loads, although the threshold varies. Officials in 7 out of 10 states interviewed told us that requiring escort vehicles improves safety. For example, officials from Washington State and South Dakota said that escort vehicles improve safety because they improve visibility of the oversize or overweight load for other drivers. In 2004, SC&RA issued a best practices guide for escort vehicles, with participation from FHWA, although there is not a legal requirement that supports such a guide, according to FHWA officials.<sup>29</sup>

- *Escort vehicle driver certification:* While the use of escort vehicles is widespread, many states currently do not require escort vehicle drivers to be certified. FHWA officials told us that there is no research that shows escort vehicle driver certification is a benefit to safety. Conversely, NTSB has previously concluded that the lack of standardization in certification of escort vehicle drivers leaves some drivers poorly prepared to carry out their duties and has recommended standardized training and certification for drivers.<sup>30</sup> Thirteen states currently require such certification, which may involve training or passing a test. Of the 10 states we reviewed, two have such a requirement. For example, Washington State officials said that certification is a good practice that is required in their state, but cautioned that even with training and certification there is still the possibility of human error. Officials from 5 states of the 10 interviewed told us they have considered or are seeking to implement this requirement to improve safety or ease the burden of law enforcement officials, who may be required to escort. For example, Wisconsin officials said they would like to implement a certification process so that escort vehicle drivers can direct traffic.<sup>31</sup> The remaining three states are not pursuing certification. For example, South Dakota

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<sup>29</sup>Specialized Carriers & Rigging Association, *Pilot Car Escort Best Practices Guidelines* (Fairfax, VA: 2004).

<sup>30</sup>National Transportation Safety Board, *Highway Accident Report: Collapse of the Interstate 5 Skagit River Bridge Following a Strike by an Oversize Combination Vehicle, Mount Vernon, Washington, May 23, 2013* (Washington, D.C.: July 15, 2014).

<sup>31</sup>Wisconsin officials stated that current state law does not allow escort vehicle drivers to direct traffic, so a police officer must be used. If certified escort vehicle drivers could direct traffic, it could reduce the need to use police officers, who have limited availability.

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officials said that they do not require escort vehicle drivers to be certified, because the lack of driver certification has not been identified as a problem.

States have established processes and determined requirements for permitting of oversize and overweight vehicles over time. In some areas, states follow similar practices and requirements: for example, most states make use of online permitting systems and escort vehicles. However, other processes and requirements differ and state officials we interviewed did not always agree on the benefits of various practices, such as automated routing systems and escort vehicle driver certification.

Nearly all state officials whom we spoke with told us that federal regulations standardizing permitting were unnecessary; however, some state officials we interviewed told us that more information on different permitting practices and their resulting benefits would be helpful to them to determine ways their state practices could be improved. For example, Texas officials stated that Texas's current permitting rules are sufficient, but they are always looking for ways to do things better. Maine officials told us that FHWA could help identify best practices in permitting, as states typically have constrained resources and do not have the capacity to conduct this type of research. We have identified key steps agencies can take to improve agency performance; one of them includes identifying best practices to help identify changes that might be needed to improve performance.<sup>32</sup> However, according to all the state officials we interviewed, the federal government did not provide any or very little guidance used in oversize and overweight permitting. FHWA officials told us that although they collect limited information on state permitting practices, they do not have research or data that compare state permitting information or identify best practices due to lack of authority over state permitting. However, FHWA has authority to conduct transportation research, including research on issues with national implications that could lead to improvements in highway safety,<sup>33</sup> and in the past has worked with the trucking industry and others to identify best practices for related issues such as escort vehicles.

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<sup>32</sup>[GAO/GGD-96-118](#).

<sup>33</sup>23 U.S.C. §§ 502, 503.

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Our review uncovered examples of how research of state permitting to identify best practices could better position FHWA to provide technical assistance to states that could help inform state policy and legislative changes needed to improve their permitting of oversize and overweight vehicles. For example, some state officials we interviewed described the large upfront investment of money and resources to acquire an automated routing system as a limiting factor to their state having such a system. Officials in South Dakota, which currently uses an automated routing system, agreed that while their system was expensive to implement and difficult to obtain support for, the investment has led to benefits of improved efficiency, that the state has benefitted more than the cost of the system, and that its use can be considered a best practice. Also as previously mentioned, state officials we interviewed described the varying state requirements on certification of escort vehicle drivers. Some state officials we interviewed described how state decisions on certification of escort vehicle drivers could increase costs to carriers, as they have to cover the cost of certification, as well as affect the availability of state law enforcement officers to perform other commercial vehicle enforcement functions. By conducting this type of research, FHWA would be better positioned to help states make sound decisions to improve safety and protect infrastructure in a cost-effective manner.

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## Conclusion

FHWA's policy is to provide a safe and efficient highway system that accommodates large vehicles, in part by regulating some aspects of vehicle size and weight and ensuring state enforcement of federal standards. However, FHWA has an opportunity to do more. Our review shows that state practices in regulating and enforcing oversize and overweight loads—in particular permitting practices—vary; further, states lack information on how well the range of practices being used actually work. In fact, FHWA has previously recognized the benefit in developing and distributing best practices in this area, as shown through its prior work with the trucking industry on an escort vehicle best practices guide. A similar study related to state permitting practices and requirements could help identify best practices to assist states in making decisions on their permitting practices. However, because FHWA does not collect information on state permitting, it is not in the best position to advise states on practices and requirements that could improve their performance.

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## Recommendation for Executive Action

To improve stewardship over the nation's highways and bridges, we recommend that the Secretary of Transportation direct the FHWA Administrator to take the following action:

- Conduct a study on state oversize- and overweight-permitting practices, including automated vehicle routing and escort driver certification, to identify areas of best practice and share the results with states.

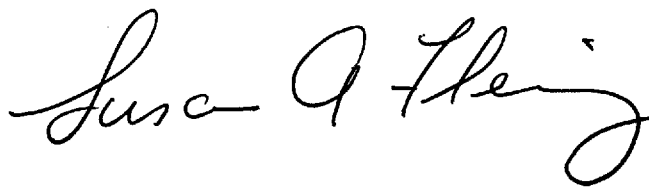
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## Agency Comments

We provided a draft of this report and the e-supplement to DOT for review and comment. DOT concurred with our recommendation and provided written comments, which are reprinted in appendix II. DOT also provided technical comments, which we incorporated as appropriate. DOT did not have any comments on the e-supplement.

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We are sending copies of this report to the appropriate congressional committees and the Secretary of Transportation. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>. If you or your staff have any questions about this report please contact me at (202) 512-2834 or [flemings@gao.gov](mailto:flemings@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



Susan Fleming  
Director, Physical Infrastructure

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# Appendix I: Objectives, Scope, and Methodology

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This report examines (1) how DOT regulates and provides oversight of oversize vehicles and loads on highways and bridges and (2) how state agencies regulate oversize vehicles and loads on highways and bridges. For the purposes of our review, we defined an oversize vehicle and load to include when the vehicle and the cargo it is carrying exceeds the legal dimensions of length, height, or width as defined by federal and state requirements for the state in which the vehicle will be traveling. We defined an overweight vehicle and load as any vehicle or vehicle and load in which the vehicle and the cargo it is carrying exceed the legal dimensions for weight as defined by federal and state requirements for the state in which the vehicle will be traveling. The federal and state requirements that set size and weight standards could be in legislation or regulations. FHWA is the federal agency that oversees transportation of oversize and overweight vehicles and loads on highways and bridges.

To determine how DOT regulates and provides oversight of oversize vehicles and loads on highways and bridges, we reviewed relevant legislation, obtained program documents from and conducted interviews with FHWA and FMCSA officials to obtain information on current policies, procedures, and practices for monitoring the transportation of oversize and overweight vehicles and loads. Specifically, we obtained information about what data FMCSA currently collects on oversize and overweight loads; how FHWA coordinates with state agencies; actions FHWA has taken in its oversight process; and challenges, if any, that FHWA faces in improving highway safety, infrastructure preservation, and interstate commerce in relation to oversize and overweight loads. In addition, we conducted a literature search to identify and review relevant studies, reports, and available data on oversize loads to gain a better understanding of the issue.

To determine how state agencies regulate oversize vehicles and loads on highways and bridges, we conducted a literature review of and legal research on state laws, requirements, and restrictions on oversize and overweight loads. In addition, we conducted an online search of federal and state information about oversize and overweight vehicles and loads to identify data topics to collect and compare between the states. We reviewed commercially available information on states' vehicle size requirements, and then developed and administered a data-collection instrument to officials from the 50 states and the District of Columbia in order to verify various state permitting practices. We created an e-supplement [GAO-15-235SP](#) from this data that allows the user to compare different combinations of selected states. The data were verified by state officials in permitting and law enforcement. We developed the

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data collection instrument to send requests via email to state officials for verification of the data and additional information, including any data points unavailable online. We received completed responses from the 51 respondents for a response rate of 100 percent. We reviewed responses for inaccuracies or omissions, analyzed the data, and have presented the key findings in this report and the full findings in the e-supplement, which can be viewed at [GAO-15-235SP](#).

We also conducted interviews with state officials in 10 states to collect non-generalizable information on state permitting and enforcement practices related to oversize and overweight loads. We selected states that were (1) geographically diverse, (2) varied in the involvement of different regional permitting consortiums, (3) varied in the types of permitting requirements, (4) varied in the use of online electronic permitting, and (5) varied in crash and enforcement data availability. Using these criteria, we interviewed state officials from Iowa, Maine, Nebraska, New York, Pennsylvania, South Dakota, Tennessee, Texas, Washington, and Wisconsin. We used GAO's prior work on improving agency performance as criteria to identify key steps agencies could take to improve state practices.<sup>1</sup>

In addition, we also conducted interviews with representatives from national transportation organizations to obtain additional information on issues related to permitting and efforts by states to deal with these issues. Interviewees included the American Association of State Highway and Transportation Officials, the Commercial Vehicle Safety Alliance, the Specialized Carrier and Rigging Association, the American Trucking Association, and the National Pilot Car Safety Institute. Additionally, to understand the circumstances of the Interstate 5 bridge collapse in Washington State, we reviewed the National Transportation Safety Board (NTSB) documents, attended an NTSB Board meeting on the Interstate 5 bridge collapse, and interviewed relevant NTSB officials and investigators.

We conducted this performance audit from April 2014 to February 2015 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our

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<sup>1</sup>[GAO/GGD-96-118](#).

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findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix II: Comments from the Department of Transportation



U.S. Department  
of Transportation

Office of the Secretary  
of Transportation

Assistant Secretary  
for Administration

1200 New Jersey Avenue, SE  
Washington, DC 20590

FEB 04 2015

Susan Fleming  
Director, Physical Infrastructure Issues  
U.S. Government Accountability Office  
441 G Street NW  
Washington, DC 20548

To preserve our Nation's infrastructure and to keep trucks and buses moving efficiently and safely, the Federal Highway Administration (FHWA) partners with States to ensure that commercial motor vehicles comply with Federal size and weight standards. The FHWA's Office of Freight Management and Operations is responsible for certifying State compliance and enforcement of heavy truck and bus size and weight standards in the United States. The FHWA's 52 division offices provide one-on-one support to individual States, the District of Columbia, and Puerto Rico to assist with policy questions, clarifications of laws and regulations, reporting requirements, training, and other related program issues. The FHWA does not mandate standard processes or procedures for State permitting of oversize/overweight vehicles because that authority remains with the States. However FHWA provides assistance to the States with respect to vehicle permitting activities.

- The FHWA requires States to prepare and submit an annual Truck Size and Weight Certification (Certification) and State Enforcement Plan. The FHWA division offices review these documents to verify that each State is enforcing vehicle size and weight laws, and that State laws do not conflict with Federal laws.
- Pursuant to the requirements of the Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21), FHWA is compiling State size and weight laws, including permitting practices, and conducting a study to evaluate and compare the impacts of trucks loaded at or below current Federal truck size and weight limits to those operating in excess of those limits. This report will include critical information on State laws regarding issuance of permits for oversize/overweight vehicles.
- During fiscal year 2015, FHWA will update its Pilot Car Escort Vehicle Training Outreach Materials to address new requirements and to address high priority areas.
- The FHWA is working with the trucking industry to update its best practices guide on escort vehicle operations and driver certification.
- The FHWA is monitoring the trends in overweight and oversize permitting during the annual evaluations to ensure that permitting data is reported correctly by the States, and substantial increases or decreases are justified.
- To enhance State oversize/overweight permitting practices and to improve opportunities for multi-State coordination, FHWA is providing technical expertise to an ongoing study, National Cooperative Highway Research Program 08-97, "Finding and Using Data to Identify and Evaluate Corridors for Transporting Multi-State, Multi-modal Oversize/Overweight Freight."



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**Appendix II: Comments from the Department  
of Transportation**

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Based upon our review of the draft report, we concur with the recommendation. The Department will provide a detailed response to the recommendation within 60 days of the GAO report issuance.

We appreciate this opportunity to offer additional perspective on the GAO draft report. Please contact Patrick D. Nemons, Deputy Director of Audit Relations, at (202) 366-4986 with any questions or if the GAO would like to obtain additional details about these comments.



Keith Washington  
Acting Assistant Secretary for Administration

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Susan Fleming, (202) 512-2834 or [fleming@gao.gov](mailto:fleming@gao.gov)

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## Staff Acknowledgments

In addition to the individual named above, Heather MacLeod (Assistant Director), Natalie Block, Brian Chung, Dave Hooper, Les Locke, Josh Ormond, Amy Rosewarne, Kelly Rubin, and Lorelei St. James made key contributions to this report. Also, Alice Feldesman and John Mingus made key contributions to the accompanying e-supplement ([GAO-15-235SP](#)).

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