



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

July 9, 2025

Dockets Operations
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor
Washington, DC 20590-0001

RE: Docket Number: FMCSA-2025-0108

Parts and Accessories Necessary for Safe Operation; Retroreflective Sheeting on Semitrailers and Trailers

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments in response to the notice of proposed rulemaking (NPRM) published in the Federal Register by the Federal Motor Carrier Safety Administration (FMCSA) on May 30, 2025, seeking comments on the agency's proposal to rescind the requirements for retroreflective sheeting on semitrailers and trailers manufactured prior to December 1, 1993, Docket No. FMCSA-2025-0108.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to prevent commercial motor vehicle crashes, injuries and fatalities and believes that collaboration between government and industry improves road safety and saves lives. Our mission is to improve commercial motor vehicle safety and enforcement by providing guidance, education and advocacy for enforcement and industry across North America.

As noted in the NRPM, the retrofitting requirements were adopted by the Federal Highway Administration (FHWA) on March 31, 1999, and require that motor carriers engaged in interstate commerce install retroreflective tape or reflex reflectors on the sides and rear of semitrailers and trailers that were manufactured prior to December 1, 1993, have an overall width of 2,032 mm (80 inches) or more, and a gross vehicle weight rating of 4,536 kg (10,001 pounds) or more. In the NPRM, FMCSA notes that the agency believes the vast majority of trailers currently in use were manufactured after 1993, making the retrofitting rule unnecessary. FMCSA states that this change would eliminate obsolete regulatory text without compromising safety.

However, roadside inspection data from FMCSA's Motor Carrier Analysis and Information Resources (A&I) database indicates that in calendar years 2021-2025, thousands of violations of § 393.13 *Retroreflective sheeting and reflex reflectors, requirements for semitrailers and trailers manufactured before December 1, 1993* were documented. According to A&I, during calendar years 2021-2025, inspectors found 25,496 violations of § 393.13 while conducting

inspections on commercial motor vehicles required to comply with the regulation.¹ While it may be true that the majority of commercial motor vehicles on the roads today were manufactured after December 1, 1993, inspection data shows that there are still thousands of vehicles in operation today that are not in compliance with this critical safety regulation. Removing this requirement while inspectors are still finding thousands of violations annually is premature and would have a negative impact on roadway safety. CVSA recommends FMCSA leave the requirements in § 393.13 in place.

CVSA works to closely monitor, evaluate, and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the opportunity to provide feedback to the agency.

If you have further questions or comments, please do not hesitate to contact me at 202-998-1008 or collin.mooney@cvsa.org.

Respectfully,



Collin B. Mooney, MPA, CAE
Executive Director
Commercial Vehicle Safety Alliance

¹ Roadside Inspection Activity, Calendar Years 2021-2025, Analysis & Information Online, Federal Motor Carrier Safety Administration, https://ai.fmcsa.dot.gov/EnforcementPrograms/Inspections?type=AllViolations&time_period_id=2&report_date=0&vehicle_type=1&critical=0&state=NAT&domicile=ALL (last visited July 2, 2025)