



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

March 6, 2026

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

RE: Docket Number: FMCSA-2025-0124

Clarification to the Applicability of Emergency Exemptions; Response to Petitions for Reconsideration

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments in response to the Federal Motor Carrier Safety Administration's (FMCSA) notice of proposed rulemaking (NPRM) seeking stakeholder input on the agency's response to petitions for reconsideration regarding the length of the emergency relief automatically triggered subsequent to a regional declaration of emergency by a governor of a state, their authorized representative or FMCSA, docket number FMCSA-2025-0124.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle (CMV) 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.

CVSA appreciates FMCSA's consideration of the petitions for reconsideration submitted by the Alliance and other stakeholders and welcomes the opportunity to provide additional feedback. Specifically, the NPRM seeks comment on the agency's response to petitions for reconsideration of the agency's October 15, 2023, final rule docket number FMCSA-2022-0028, Clarification to the Applicability of Emergency Exemptions, which made changes to the length of the emergency relief automatically triggered subsequent to a regional declaration of emergency by a governor of a state, their authorized representative or FMCSA.

CVSA noted in our petition for reconsideration that, while 14 days may seem like a sufficient amount of time, it is important to take into consideration the approvals necessary at the state and local level to submit and then, at the federal level, to receive approval for an extension to an emergency declaration. Many states have indicated that in various scenarios they would need to immediately submit an extension request to FMCSA and then wait to learn if the extension has been approved. This lack of certainty in the length of the relief makes it difficult for the jurisdictions and industry to plan for and coordinate their response to the disaster. In response to this feedback and input from other organizations, FMCSA is proposing to revise the duration of the automatic emergency relief in §

390.23 *Automatic relief from regulations* from 14 days to 30 days. CVSA strongly supports this revision, as it will provide the jurisdictions and industry more time and stability when emergencies do occur, allowing them to focus more fully on the relief efforts, rather than administrative actions to ensure the waivers are sufficient.

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 agency's willingness to engage with stakeholders on these critical safety issues.

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

Respectfully,

A handwritten signature in black ink, appearing to read 'Collin B. Mooney'.

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