



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

September 2, 2025

Docket Management System
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Room W12-140
Washington, DC 20590

RE: Docket Number: PHMSA-2025-0095
Hazardous Materials: Improving Efficiencies for Special Permits and Approvals Renewals

Dear Acting Administrator Kochman,

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) notice of proposed rulemaking (NPRM) seeking stakeholder feedback on the agency's proposal to allow a grantee to file an application to renew a special permit or approval any time before its expiration date rather than requiring the application to be filed 60 days in advance, Docket Number PHMSA-2025-0095.

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.

PHMSA is proposing to revise the special permits and approvals filing requirements in 49 CFR §§ 107.109(b) and 107.705(c) of the Hazardous Materials Regulations (HMR) to allow for a grantee to apply for a renewal any time up until the expiration of the current special permit. The current requirements state that an applicant must apply for a renewal at least 60 days before an existing special permit or approval expires. CVSA's enforcement and industry members agree with PHMSA's determination that this change would not have a negative impact on safety and support implementing this change.

However, in the past, CVSA's industry members have experienced delays in receiving a determination from PHMSA regarding their renewal request, with some noting that they have waited as much as 90 days for a response from the agency. Allowing a grantee to apply for renewal up to the date of expiration could result in

increased opportunities for instances where an inspector encounters a motor carrier who has submitted their renewal request but has not yet received a determination from PHMSA. CVSA's enforcement and industry members strongly recommend that the agency establish a mechanism for inspectors to check the status of a special permit currently under review by the agency and clarify whether it may continue to be used while PHMSA is processing the renewal.

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 commitment to safety and stakeholder involvement.

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