



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-2025-0097
Hazardous Materials: Reducing Recordkeeping Requirements for Domestic Carriers

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 proposed revisions to the Hazardous Materials Regulations (HMR) to allow motor and vessel carriers the option to carry their PHMSA certificate of registration in electronic form, Docket Number PHMSA-2025-0097.

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 amend 49 CFR § 107.620 of the HMR to allow motor carriers the option to carry their PHMSA certificate of registration in electronic form. Currently, § 107.620 requires motor carriers to carry a copy of their current PHMSA issued Certificate of Registration, or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No.", onboard each truck or vessel transporting hazardous materials. Carriers must also make the copy of their certificate or the document bearing the registration number available to enforcement personnel upon request. PHMSA notes in the docket that this is an outdated requirement.

CVSA's members support this proposed change, as transitioning to electronic documentation benefits enforcement and industry by reducing the administrative burden on both, while still providing access to the necessary safety information, when appropriate. CVSA's members agree with PHMSA's conclusion that the

proposed change will not have an adverse impact on safety and support removing unnecessary regulatory requirements.

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