



# Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

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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-2025-0092**  
***Hazardous Materials: Reducing Undue Paperwork Burdens to 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 the agency's proposal to revise the Hazardous Materials Regulations (HMR) to provide domestic carriers the option to maintain electronic copies of emergency response information rather than requiring a hard copy printed on paper, Docket Number PHMSA-2025-0092.

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 § 172.602(b)(1) "Emergency response information," noting that the agency has preliminarily determined this provision is unduly burdensome as written. 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 enforcement and industry members agree with PHMSA's conclusion that the proposed change will not have an adverse impact on safety and support removing unnecessary regulatory requirements.

In addition to the language proposed in the NPRM, CVSA's members recommend PHMSA consider amending 49 CFR § 172.602(c)(1), which requires motor carriers to maintain required emergency response information "in the same manner as prescribed for shipping papers" to bring the regulations fully in line with the agency's proposal. This will ensure that the two portions of the regulations are consistent.

In addition, CVSA's members encourage PHMSA to require that drivers be trained to effectively navigate the electronic version, if it is being used. Simply having the information is not enough, the driver will need to know how to find and use the resource they need to access, such as the Emergency Response Guidebook.

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](mailto: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