

INTERESTED PARTIES FOR HAZARDOUS MATERIALS TRANSPORTATION

April 13, 2020

VIA ELECTRONIC MAIL

Anne S. Ferro
President & CEO
American Association of Motor Vehicle Administrators
4401 Wilson Boulevard
Suite 700
Arlington, VA 22203

Re: Need for Nationwide State Hazardous Material Endorsement Extensions.

Dear Ms. Ferro:

On behalf of the Interested Parties for Hazardous Materials Transportation (Interested Parties)¹, which represents shippers and carriers of hazardous materials via all modes of transportation, we wish to convey our sincere request that each state take the necessary action to adopt and implement a temporary extension of Hazardous Material Endorsement (HME) holders as permitted in a recent notice by the U.S. Department of Homeland Security's Transportation Security Administration, available here: <https://www.govinfo.gov/content/pkg/FR-2020-04-08/pdf/2020-07340.pdf>.

We have concerns about the detrimental impact of inconsistent extensions by various state governments that may culminate in preventing the transportation of critical industry supplies, packaging, and equipment. We believe that without your leadership, critical supplies, packaging, and equipment will be unnecessarily delayed or limited by the inability of HME holders to operate commercial motor vehicles. During the COVID-19 pandemic, continuing uninterrupted service is crucial. Commercial drivers operating throughout the country must be allowed to continue delivering to homes, businesses, agricultural operations, and other commercial facilities as well as emergency response operations.

¹ The Interested Parties is a volunteer-run coalition of organizations that share an interest in legislative and regulatory issues related to the safe and secure domestic and international transportation of hazardous materials. Interested Parties members include associations representing hazardous materials shippers, carriers, packaging manufacturers and other related groups. The following IP members have approved these comments: Agricultural Retailers Association; American Chemistry Council; American Coatings Association; American Pyrotechnics Association; American Trucking Associations; Association of HazMat Shippers; The Chlorine Institute; Compressed Gas Association; Council on the Safe Transportation of Hazardous Articles; Dangerous Goods Advisory Council; The Fertilizer Institute; Gases and Welding Distributors Association; Industrial Packaging Alliance of North America; Industrial Steel Drum Institute; Institute of Makers of Explosives; International Liquid Terminals Association; International Vessel Operators Dangerous Goods Association; National Motor Freight Traffic Association; National Association of Chemical Distributors; National Private Truck Council; National Propane Gas Association; National Tank Truck Carriers; New England Fuel Institute; Owner-Operator Independent Drivers Association; PRBA – The Rechargeable Battery Association; Petroleum Marketing Association of America; Radiopharmaceutical Shippers & Carriers Conference; Reusable Industrial Packaging Association; Sporting Arms Ammunition Manufacturers Institute; The Sulphur Institute; Utility Solid Waste Activities Group.

Our companies engage in intra- and interstate commerce, and a patchwork quilt of state restrictions with varying exemptions prevents us from expeditiously providing critical goods and services needed to keep the nation safe, secure and healthy. This was exactly the scenario that the referenced TSA notice is meant to address.

We respectfully request that you distribute a copy of this letter to all your members and help them to understand how important rapid action on this matter is to the millions of American citizens who depend on timely deliveries of products that can only be delivered by drivers that have a Hazardous Materials Endorsement on their CDL. We urge all your members to use the authority of their Departments, and that of the federal government, to encourage and support consistent adopting and implementation of the HME extension permitted by TSA as federal and state governments address the COVID-19 pandemic. Additionally, we would be grateful if AAMVA would publish the HME State updates on a publicly accessible location on your web site.

Thank you for your efforts.

Sincerely,

A handwritten signature in black ink that reads "Paul Rankin". The signature is written in a cursive style with a large initial "P" and "R".

Paul Rankin