



August 30, 2013

Commission for Environmental Cooperation
Joint Public Advisory Committee
393, rue St-Jacques Ouest, Bureau 200
Montreal (Quebec) Canada H2Y 1N9

RE: Commission for Environmental Cooperation Comments

Commission for Environmental Cooperation and Joint Public Advisory Committee:

As we approach the 20th Anniversary of the creation of the Commission for Environmental Cooperation (CEC), the American Trucking Associations (ATA) commends the CEC and the Joint Public Advisory Committee (JPAC) for its hard work and successes achieved over the last two decades. As the CEC and JPAC prepare to build upon its accomplishments, it is now time to map a path ahead to ensure environmental sustainability and economic growth between our three countries proceeds in a logical and coordinated manner.

ATA is the largest national trade association for the trucking industry with nearly 2,000 members. Through its federation with other trucking groups, industry-related conferences, and its 50 affiliated state trucking associations, we represent more than 37,000 members covering every type of motor carrier in the United States. ATA believes that the work of the CEC and JPAC has served a critical role in advancing better coordination in sharing data, research, resources, and funding between the United States, Canada, and Mexico. In order to continue this upward trajectory of success, ATA recommends that the CEC and JPAC work towards harmonizing truck, engine, and fuel standards, and renew its efforts to improve cross-border efficiencies throughout North America. Let us first expand upon the former.

An efficient North American transportation network leads to improved productivity, emission reductions, fuel savings, and increased profitability. As the U.S. Environmental Protection Agency (EPA) continues its efforts to reduce emissions through engine, fuel, and vehicle regulation, it is imperative that such regulations are harmonized and implemented on similar timelines in both Canada and Mexico.

To ensure competitive advantages are not recognized by fleets in neighboring countries, to achieve optimal environmental gains, and to bring more enforcement certainty for fleets traveling outside their countries of origin, the CEC and JPAC should continue to focus on efforts to harmonize engine, vehicle, fuel, and potential trailer regulations across North America. For example, the availability of ultra low-sulfur diesel fuel (ULSD) across Mexico is lagging far behind that of the United States and Canada. ULSD fuel use in 2007 and newer engines certified to United States and Canadian emission standards is critical in achieving particulate matter and nitrogen oxides emission levels. Failure to use ULSD fuel in such engines results in higher emission limits and voids



original equipment manufacturer warranties. Harmonization of fuel standards is critical in furthering the adoption of the low-emission diesel engines across north America.

Another regulatory example is EPA's adoption and implementation of first-ever greenhouse gas regulations for 2014-2018 model year vehicles and engines. While Canada has adopted equivalent truck and engine regulations for 2014 model year equipment and beyond, Mexico again lags behind a unified North American approach. As EPA and the U.S. Department of Transportation begin to develop the next round of truck greenhouse gas and fuel consumption regulations post 2018, the potential for a new trailer regulation component appear likely. Again, JPAC can serve a critical role in helping to harmonize and implement both the current and upcoming truck standards as part of its future agenda.

We are all too familiar that congestion at border crossings is projected to substantially increase in the future. ATA recognizes that there are important factors and changes that need to be considered and implemented to improve border-crossing operations: from reducing wait-times and developing new border infrastructure, to changing government regulations and business practices that inhibit the efficiency of cross-border movements. These efficiencies will evolve over time as carriers develop processes and strategies to implement these changes operationally. JPAC can serve as the conduit to uniformly expedite these necessary changes.

On the border between the United States and Mexico, there is a continued need to finalize the implementation of NAFTA's trucking provisions to reduce the need for additional motor equipment to move trailers across the border. ATA remains committed to ensuring that environmental improvements and safety on our highways remains priority one in our industry and that NAFTA's trucking provisions can be successfully implemented. We believe that the pilot program will prove this to be true and that JPAC can serve an important role in ensuring actual freight efficiency improvements are quantifiable and justified.

Again, thank you for the opportunity to submit ATA's thoughts on the path ahead for the CEC and JPAC. We commend your efforts for all that you have accomplished to date and we look forward to working with you to ensure that your future goals and objectives are achieved. If you need of any further information, please contact me at 703-838-1879 or gkedzie@trucking.org.

Sincerely,

A handwritten signature in black ink that reads "Glen P. Kedzie". The signature is written in a cursive style and is positioned to the left of a vertical line.

Glen P. Kedzie

Vice President, Energy & Environmental Counsel