



January 27, 2021

Centers for Disease Control and Prevention
Advisory Committee on Immunization Practices
C/o ATTN: November 21, 2020 ACIP Meeting
1600 Clifton Road N.E., MS H24-8
Atlanta, GA 30329-4027

RE: Docket No. CDC-2021-0002

Members of the Advisory Committee on Immunization Practices:

On behalf of the American Trucking Associations and the undersigned federation of state trucking associations, we write to respectfully request this committee consider reclassifying truck drivers into Phase 1b of its COVID-19 ACIP Vaccine Recommendations. The health of our nation's truck drivers is critical to ensuring the safe and timely delivery of medicine, food, water, fuel and other basic necessities throughout the duration of this pandemic, and as truckers are now called upon to deliver vaccines across the country, it is imperative that drivers have prioritized access in order to minimize the potential for further supply chain delays and disruptions.

In reference to this committee's December 22 interim recommendations, we call your attention to the distinction made between "frontline essential workers" in Phase 1b and "other essential workers" in Phase 1c—a distinction that is inconsistent with the Department of Homeland Security's Cybersecurity and Infrastructure Agency (CISA) *Guidance on the Essential Critical Infrastructure Workforce*. In March of 2020, CISA classified truck drivers as essential to the continued viability of our nation's infrastructure for the duration of the pandemic. That designation is based on the fact that trucking is the backbone of the domestic supply chain, *with more than 80% of U.S. communities relying exclusively on trucks for their freight transportation needs*.

In many ways, truckers are the linchpin of our nation's entire frontline response, providing daily, direct and indispensable support to all essential workers. Health care providers, first responders, corrections officers, manufacturers, grocery clerks and teachers all rely on trucks for the equipment and supplies needed to carry out their professional duties. Moreover, high-risk populations are now depending on the trucking workforce to deliver vaccine supplies to every corner of the country.

We appreciate the inordinate challenge this committee has been tasked with in developing vaccine prioritization recommendations. The trucking industry is proud to have played an outsized role through every phase of COVID-19 response and recovery. As cases continue to surge and new, highly-contagious variants of the virus take hold in the U.S., our top concern is the health and protection of our workforce. Notably, a recent study of increased death rates during the pandemic conducted by the University of California, San Francisco, suggests truck drivers are among the population at greatest risk. Including America's professional truck drivers in Phase 1b will help ensure the supply chain keeps running, essential frontline workers have the resources they need, and high-risk populations have continued access to the vaccine.

Thank you for your consideration and support during these challenging and unprecedented times.

Respectfully,

American Trucking Associations
Alabama Trucking Association, Inc.
Alaska Trucking Association, Inc.
Arizona Trucking Association
Arkansas Trucking Association
California Trucking Association
Colorado Motor Carriers Association
Delaware Motor Transport Assoc. Inc.

Florida Trucking Association, Inc.
Georgia Motor Trucking Association, Inc.
Hawaii Transportation Association
Idaho Trucking Association
Illinois Trucking Association, Inc.
Indiana Motor Truck Association, Inc.
Iowa Motor Truck Association, Inc.
Kansas Motor Carriers Association
Kentucky Trucking Association, Inc.
Louisiana Motor Transport Association, Inc.
Maine Motor Transport Association, Inc.
Maryland Motor Truck Association, Inc.
Michigan Trucking Association, Inc.
Minnesota Trucking Association
Mississippi Trucking Association
Missouri Trucking Association
Motor Carriers of Montana
Motor Transport Association of CT, Inc.
Nebraska Trucking Association
New Hampshire Motor Transport Assoc.
New Jersey Motor Truck Association
New Mexico Trucking Association
North Carolina Trucking Assoc., Inc.
North Dakota Motor Carriers Assoc., Inc.
Ohio Trucking Association
Oklahoma Trucking Association
Oregon Trucking Associations, Inc.
Pennsylvania Motor Truck Association
Rhode Island Trucking Association, Inc.
South Carolina Trucking Assoc., Inc.
South Dakota Trucking Association
Tennessee Trucking Association
Texas Trucking Association
Trucking Association of Massachusetts
Trucking Association of New York
Utah Trucking Association
Vermont Truck and Bus Association, Inc.
Virginia Trucking Association
Washington Trucking Associations
West Virginia Trucking Association, Inc.
Wisconsin Motor Carriers Association
Wyoming Trucking Association, Inc.