

August 13, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Administrator Zeldin,

On behalf of the trucking industry, thank you for your continued work to support a balanced and pragmatic approach to environmental regulation. Our associations appreciate your Agency's commitment to engaging with industry stakeholders and your willingness to reevaluate regulations to adequately balance environmental protection with the need to sustain economic growth and industry competitiveness. We are especially grateful for your March 12, 2025, announcement and decision to reevaluate the final rule titled *Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards* (88 Fed. Reg. 4296, Jan. 24, 2023). Your recognition of the significant challenges these heavy-duty NO_x standards pose for the trucking industry is timely and appreciated.

As finalized, the heavy-duty NO_x rule imposes substantial compliance costs and operational burdens at a time when the trucking industry is already contending with historically difficult market conditions. With prolonged weakness in freight demand and inflationary cost pressures, the rule's 2027 implementation timeline threatens to intensify strain across our industry.

We respectfully request that EPA delay implementation of the heavy-duty NO_x rule until 2031. This implementation delay will allow heavy-duty truck engine manufacturers to continue providing reliable and affordable engine products that meet today's stringent 0.20 g/bhp-hr. NO_x standard. Today's modern trucks produce 99% fewer NO_x and particulate matter emissions than those from previous generations, and our industry remains committed to continued air quality improvements. We also believe that delaying the rule will provide an economic lifeline for the trucking industry, while ensuring continued emissions reductions.

Furthermore, we urge EPA to conduct a full reconsideration of current heavy-duty NO_x standards, allowing for a comprehensive review and public comment on key provisions, including NO_x stringency levels, warranty obligations, useful life requirements, and associated technical elements. EPA would need to finalize this review and rulemaking process by the end of 2026 to provide engine manufacturers with the requisite lead time for implementation in 2031.

An implementation delay will provide much-needed near-term certainty, and a full reconsideration of the heavy-duty standards will help ensure the trucking industry's ability to

affordably deliver our nation's freight in a safe and efficient way. Without these actions, especially under today's challenging economic conditions, an unsustainable burden will be placed on fleets and equipment manufacturers alike.

Thank you again for your leadership and continued engagement on this critical issue. We look forward to working closely with you and your team in the weeks and months ahead.

Sincerely,

American Trucking Associations
National Tank Truck Carriers
Truckload Carriers Association
Alabama Trucking Association
Alaska Trucking Association
Arizona Trucking Association
Arkansas Trucking Association
California Trucking Association
Colorado Motor Carriers Association
Florida Trucking Association
Georgia Motor Trucking Association
Hawaii Transportation Association
Idaho Trucking Association
Illinois Trucking Association
Indiana Motor Truck Association
Iowa Motor Truck Association
Kansas Motor Carriers Association
Kentucky Trucking Association
Louisiana Motor Transport Association
Maine Motor Transport Association
Maryland Motor Truck Association
Trucking Association of Massachusetts
Michigan Trucking Association
Minnesota Trucking Association
Mississippi Trucking Association
Missouri Trucking Association
Montana Trucking Association
Motor Transport Association of CT
Nebraska Trucking Association
Nevada Trucking Association
New Hampshire Motor Transport Association
New Jersey Motor Truck Association
New Mexico Trucking Association
Trucking Association of New York
North Carolina Trucking Association
North Dakota Motor Carriers Association

Ohio Trucking Association
Oklahoma Trucking Association
Oregon Trucking Association
Pennsylvania Motor Truck Association
Rhode Island Trucking Association
South Carolina Trucking Association
South Dakota Trucking Association
Tennessee Trucking Association
Texas Trucking Association
Utah Trucking Association
Vermont Truck and Bus Association
Virginia Trucking Association
Washington Trucking Associations
West Virginia Trucking Association
Wisconsin Motor Carriers Association
Wyoming Trucking Association