



MANITOBA TRUCKING ASSOCIATION

November 19, 2009

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Mr. John Pearson, Secretary
Task Force on Vehicle Weights and Dimensions Policy
2323 St. Laurent Blvd.
Ottawa, ON K1J 4K6

Dear Mr. Pearson;

RE: **Long Wheelbase Trailers (Double Drop and Low Bed Trailers)**

The Manitoba Trucking Association (MTA) requests the Task Force on Vehicle Weights and Dimensions Policy review existing policies and practices within the Canadian jurisdictions in regards to certain double drop and low bed trailers. The specifics of this request and our recommendation are articulated within the attached document.

It should be noted that MTA has discussed this matter with the other provincial / regional trucking associations. Atlantic Provinces Trucking Association (APTA), Quebec Trucking Association (QTA), Ontario Trucking Association (OTA), Saskatchewan Trucking Association (STA), Alberta Motor Transport Association (AMTA) and British Columbia Trucking Association (BCTA) support this recommendation.

We appreciate your attention to this matter and hope our request and recommendation will result in jurisdictional amendments to policies and practices that will allow our industry to become more productive and efficient while at the same time help reduce our GHG foot print.

We would be pleased to discuss this matter in further detail and would gladly respond to any questions that may arise from our request and recommendation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. P. Dolyniuk'.

Bob Dolyniuk,
General Manager

Attachment.

Manitoba Trucking Association Recommendation

Long Wheelbase Trailers (Double Drop and Low Bed Trailers)

Background

When the (R)TAC study was undertaken in the 1980's and the (R)TAC standards adopted in 1988, it would appear that little consideration was given to potential operational challenges with double drop and low bed trailers and the specific requirements of that sector of the trucking industry.

Today there are issues confronting industry and governments as it relates to the effective and efficient use of double drop and low bed trailers that should be designed and built to today's needs.

Over the years, farm equipment, harvesting equipment and construction equipment have become larger. For many types of loads the working deck well of double drop and low bed trailers may be too short due to wheelbase regulations. This has resulted in a need for longer deck well length on these trailers, resulting in a trailer wheelbase in excess of 12.5m (41'). Operators have been designing and building specialized trailers with sole purpose use, while at the same time trying to comply with the wheelbase regulations. While the use of sole purpose trailers may have been acceptable in the past, in today's environment such practices are not practical. Industry has to be as efficient and productive as it can to remain competitive. To do so, sole purpose use trailers have become an extreme exception rather than the rule.

Over the last number of years, there have been varying degrees of discussion on this issue and attempts have been made to address the issues via permits.

While permitting systems may provide a temporary solution to the issues, they will not provide a long term solution. It is recognized that managing a permit system for governments and industry can be a time and staff consuming process, which should be avoided where possible.

Issue

Industry has indicated that there is a need for both tandem and tridem double drop and low bed trailers with a well deck length in excess of 8.23m (27').

While it is possible to design and build double drop and low bed trailers with a longer deck well (greater than 8.23m or 27') and with an overall length of 16.15m (53'), the resulting wheel base tends to exceed the 12.5m (41') wheelbase allowable maximum, dependent on the configuration. Double drop and low bed trailers are different from van and flat deck trailers as their axles and axle groups are fixed and do not slide and are therefore not adjustable. Whatever is designed and built is what the carrier must live with.

In the case of both double drop and low bed trailers, Canadian jurisdictions should allow the use (without permit) of tandem axle units with minimum wheelbase of 6.25m (20.5') and an overall length of 16.15m (53'). Additionally these trailers should be allowed to be utilized with a flip axle to re-configure the trailer into a tridem axle trailer, or as a fixed tridem axle group, or as a tridem axle group with a lift axle in the group, while not exceeding the overall maximum length of 16.15m (53').

These configurations (double drop and low bed), whether equipped with tandem or tridem axle groups, should be allowed to operate with both over-dimensional loads (with permits as required) and reducible, non-dimensional loads at RTAC weight levels (without permits).

If the trailer is further specialized and is wider than 2.6m (8.5') it should be allowed to haul reducible loads on a round trip basis (i.e. a low bed trailer that is 3.05m (10') wide should be allowed to haul a 2.44m (8') culvert one way and a 2.6m (8.5') wide packer in return). This equipment is commonly utilized by construction companies. The only time a permit should be required is when an over-dimensional load is being hauled, or if the actual trailer itself is over-dimensional (e.g. greater than 2.6m (8.5') wide, longer than 16.15m, etc.).

While some may argue that this might create a competitive advantage, it is clear that a tandem or tridem double drop or low bed trailer would not have a competitive advantage over a tandem, tridem or "B" train flat deck trailer for general freight.

Conclusion

Canadian jurisdictions should allow the operation (without permit) of tandem and tridem axle double drop and low bed trailers with a maximum overall length of 16.15m (53') and a minimum trailer wheelbase of 6.25 m (20.5'). A tandem axle trailer with a flip axle, which allows it to convert to a tridem axle group must meet the 16.15 (53') overall length in the tridem configuration.