



**Truck Size and Weight Fly-in
February 4th, 2009**

Participants

Craig Bulkley, Executive Board Member - Washington Council of Police and Sheriffs

Sheriff Dwain Dennis, Executive Board Member - Michigan Sheriffs' Association

Larry DeYoung, President - Livonia, Avon and Lakeville Railroad

Stephen Drunic, Vice President, Finance - Nashville & Eastern Railroad Corporation

*Howard Glassman, Executive Director - Florida Metropolitan Planning Organization
Advisory Council*

Chief Steven Glick, Executive Board Member - Ohio Association of Chiefs of Police

Richard Henderson, Director of Government Affairs - Commercial Motor Vehicle Alliance

Brian Hollo, President - Illinois State Police Command Officers Association

Joe Krahn - California Association of Counties

Shane Johnson, President - Troopers for a Safer Ohio

Carol Leveroni, Executive Director - California Peace Officers Association

Bruce Lieberman, Vice President & Chief Financial Officer - Anacostia & Pacific Company

Yvette Pena Lopes, Director of Government Affairs - Blue Green Alliance

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Commissioner Oscar Ortiz - Nueces County, TX

Hernan Pena, Director of Traffic and Transportation - City of Charleston

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David Weinstein, Manager of Public & Government Affairs - AAA Mid-Atlantic



National Organizations Supporting SHIPA (H.R. 1618, S. 779)

International Brotherhood of Teamsters
AAA
Owner-Operator Independent Drivers Association
BlueGreen Alliance
National Troopers Coalition
National Sheriffs' Association
National Association of Police Organizations
Natural Resources Defense Council
Transportation for America
Service Employees International Union
Sierra Club
Communications Workers of America
United Steelworkers
Utility Workers of America
National Association of Emergency Medical Technicians
Western States Sheriffs' Association
Laborers' International Union of North America
Environment America
National Black Police Association
Hispanic American Police Command Officers Association
Truck Safety Coalition
National Association of Women Highway Safety Leaders
Advocates for Highway and Auto Safety
Public Citizen
Friends of the Earth
Consumer Federation of
American
Citizens for Reliable and Safe Highways
Parents Against Tired Truckers
Kids and Cars
Trauma Foundation
National Association of Railroad Passengers

Safe Highways and Infrastructure Preservation Act

Cosponsors - 111th Congress – H.R. 1618

NY-05	Ackerman	AZ-07	Grijalva	FL-15	Posey
NJ-03	Adler	FL-23	Hastings	IL-05	Quigley
MO-02	Akin	NM-01	Heinrich	TX-16	Reyes
NJ-01	Andrews	NY-22	Hinchey	CA-37	Richardson
CA-43	Baca	PA-17	Holden	FL-18	Ros-Lehtinen
NV-01	Berkley	NJ-12	Holt	NJ-09	Rothman
CA-28	Berman	CA-15	Honda	CA-34	Roybal-Allard
IL-13	Biggert	WA-01	Inslee	IL-01	Rush
CA-50	Bilbray	NY-02	Israel	CA-39	Sanchez
PA-01	Brady	IL-02	Jackson	CA-47	Sanchez
CA-23	Capps	TX-18	Jackson-Lee	IL-09	Schakowsky
MA-08	Capuano	TX-30	Johnson	CA-29	Schiff
IN-07	Carson	MI-05	Kildee	PA-13	Schwartz
FL-11	Castor	IL-10	Kirk	NY-16	Serrano
MO-01	Clay	FL-22	Klein	PA-07	Sestak
VA-11	Connolly	OH-10	Kucinich	CA-27	Sherman
MI-14	Conyers	RI-02	Langevin	IL-19	Shimkus
IL-12	Costello	OH-14	LaTourette	NJ-13	Sires
CT-02	Courtney	CA-09	Lee	MO-04	Skelton
NY-07	Crowley	GA-05	Lewis	NY-28	Slaughter
TX-07	Culberson	CA-16	Lofgren	WA-09	Smith
IL-07	Davis	NM-03	Lujan	CA-12	Speier
CA-53	Davis	NY-14	Maloney	CA-13	Stark
MA-10	Delahunt	MA-07	Markey	FL-06	Stearns
CT-03	DeLauro	MN-04	McCollum	OH-13	Sutton
TX-25	Doggett	WA-07	McDermott	MA-06	Tierney
PA-14	Doyle	MA-03	McGovern	NV-03	Titus
OH-01	Driehaus	CA-11	McNerney	MD-08	Van Hollen
MI-03	Ehlers	FL-17	Meek	IN-01	Visclosky
MN-05	Ellison	CA-07	Miller, Geo.	FL-20	Wasserman-Schultz
IN-08	Ellsworth	VA-08	Moran	CA-35	Waters
CA-14	Eshoo	PA-12	Murtha	CA-33	Watson
CA-17	Farr	NY-08	Nadler	NC-12	Watt
PA-02	Fattah	CA-38	Napolitano	CA-06	Waxman
CA-51	Filner	DC	Norton	NY-09	Weiner
MA-04	Frank	TX-27	Ortiz	FL-19	Wexler
OH-11	Fudge	NJ-06	Pallone	OH-06	Wilson
CA-10	Garamendi	NJ-08	Pascrell	VA-10	Wolf
CA-24	Gallegly	NJ-10	Payne	CA-06	Woolsey
TX-09	Green	MI-09	Peters	OR-01	Wu
TX-29	Green	PA-19	Platts		

Safe Highways and Infrastructure Preservation Act

Cosponsors - 111th Congress – S. 779

CA – Feinstein MO – Bond CA – Boxer OH – Brown
MA – Kerry NJ – Lautenberg MO – McCaskill NM – Udall

Republican Members

November 5, 2009

Transportation & Infrastructure Committee Members
Environment & Public Works Committee Members



SUPPORT LEGISLATION TO KEEP TRUCKS FROM GETTING BIGGER

SHIPA would protect our roads and bridges by capping the length of truck trailers, freezing the weights of trucks traveling on the National Highway System, and extending the existing freeze on Interstate operations of longer combination vehicles to the entire National Highway System.

Congressman James McGovern & Senator Frank Lautenberg have introduced the Safe Highways and Infrastructure Preservation Act (SHIPA, H.R. 1618 & S. 779) which would freeze the size and weight of trucks on our highways and will help preserve our roads and bridges by enacting the measures below.

Freeze the weight of trucks

Congress set 80,000 pounds as the maximum weight at which a truck can operate on Interstate highways. Yet, because of loopholes in the law, trucks routinely operate on Interstates and other highways above federal weight limits. This bill would extend the truck weight freeze beyond the 46,000-mile Interstate system to the entire 161,000 miles of National Highway System (NHS).

Extend the freeze on LCVs

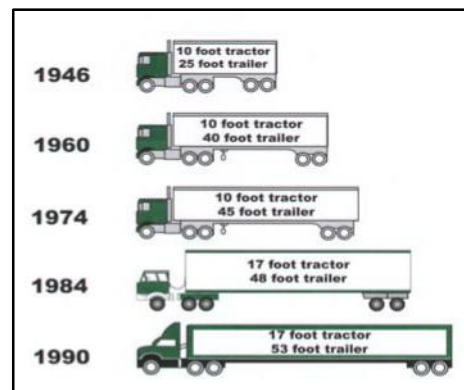
In 1991, Congress “froze” the operation of longer combination vehicles (LCVs) – long double and triple trailer trucks – on Interstates and stopped LCVs from spreading onto a larger share of the Interstate system. These bills extend this freeze to the entire NHS.

Freeze the length of trucks

Today, there is no federal limit on the length of semi-trailers. Over the years, trailer length has grown such that eleven states allow trailers over 53 feet¹ (the industry standard) and Wyoming even allows 60-foot-long trailers to operate. These bills will cap the length of truck trailers at 53 feet, but allow existing legal operations of trailers that exceed 53 feet to continue.

Improve enforcement of truck weight laws

Trucks often run illegally overweight because the profits from hauling the extra weight often exceed the fines levied by the states for overweight operations. This bill calls for a model fine schedule designed to recover as fully as possible all infrastructure, enforcement, and administrative costs of overweight operations and to act as an effective deterrent.



¹ The eleven states are Alabama, Arizona, Arkansas, Colorado, Kansas, Louisiana, New Mexico, New York, Oklahoma, Texas, and Wyoming.

WHY THESE BILLS ARE NECESSARY

Groups are lobbying to increase truck sizes and weights

The American Trucking Association is pushing to allow states to authorize single-trailer trucks up to 97,000 pounds. They also want to lift the LCV freeze and give states the power to authorize longer combination vehicles, which would allow the truckers to lobby for double and triple-trailer trucks across the country. Another group, Americans for Safe and Efficient Transportation, which represents big shippers, is lobbying Congress to approve “pilot projects” that allow 97,000 pound singles in six states. Additionally, bills have been introduced in the U.S. Senate that would authorize 97,000 pound singles on the Interstate system.

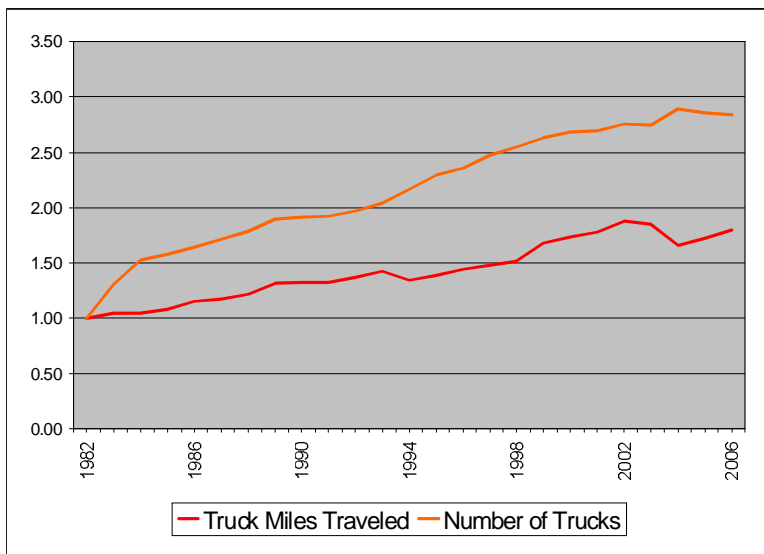
Our roads and bridges are overwhelmed and in disrepair

23,309 of the 116,145 bridges on the National Highway System (over 20%) are rated as structurally deficient or functionally obsolete.² To make matters worse, a shortfall in the Highway Trust Fund (the national fund of fuel tax revenue that is set aside for transportation projects) is predicted for 2009.

Bigger trucks would make this problem worse

Proponents say that allowing bigger trucks on the roads will lead to fewer trucks on the road. They say it will not only reduce shipping costs, but also reduce highway congestion and so be better for the environment.

History shows that this is false, however. The number of trucks registered in the U.S. and the mileage traveled by trucks has gone up nearly every single year since Congress increased the federal weight limit in 1982. Bigger trucks end up diverting freight from other modes of transportation like railroads and causing even more highway congestion and pollution.



To add insult to injury, trucks over 80,000 pounds only pay for 50% of the damage they cause.³ Nationwide operation of LCVs would add \$53 billion in new bridge reconstruction costs, according to USDOT.⁴ In addition, there would be \$266 billion in lost time and extra fuel burnt by auto drivers stuck in traffic because of bridge work. Total bridge costs would be \$319 billion.

² *National Bridge Inventory*, Federal Highway Administration, 2007.

³ *Addendum to the 1997 Highway Cost Allocation Study*, Federal Highway Administration, 2000.

⁴ *Comprehensive Truck Size and Weight Study*, US Department of Transportation, 2000.



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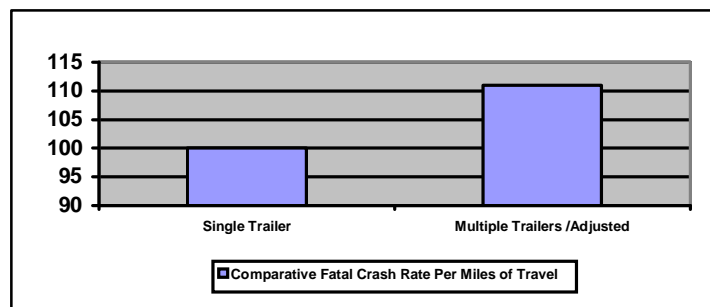
Bigger Trucks Mean Less Safe Highways

Big trucking companies and their allies among major shipping companies are currently lobbying Congress to end the “freeze” on the expansion of longer combination vehicles (LCVs) – double and triple trailer trucks up to 120 feet long and increase the weight of current single tractor trailer trucks from the current 80,000 pounds to 97,000 pounds. The proponents of these increases claim these trucks are safer. In reality heavier trucks create unacceptable and unnecessary new highway safety risks.

Increased Fatal Accident Risk

According to the August 2000 US DOT Comprehensive Truck Size and Weight Study, LCVs are likely to have fatal accident involvement rates at least 11% higher than today’s single tractor trailers. DOT analyzed the accident experience of twin 28-foot combinations that are legal nationwide today. In DOT’s words:

“ . . . under conditions of generally unrestricted use similar to that of single-trailer combinations, multi-trailer combinations – as they are currently designed and configured – could be expected to experience an 11 percent higher overall fatal crash rate than single-trailer combinations. *This finding is significant in terms of the debate on ‘the safety of LCVs.’*”



**Based on a chart from the
US DOT's Comprehensive
Truck Size and Weight
Study**

Source: US DOT Comprehensive Truck Size and Weight Study (US DOT Study), August 2000.

In its *Western Uniformity Scenario Analysis* published in April of 2004, the US DOT specifically criticized an oft cited industry backed study conducted in Canada that produced results favorable toward LCV’s. US DOT notes that the “study introduces a bias since [it] only analyzes the best performing roads.” (p. VI-16) Similarly, USDOT criticized a 1996 trucking industry-funded study by the Scientex Corporation, finding that with respect to the study “one cannot disregard the potential for self reporting and selection bias.” (p. XI-2) **Source:** US DOT *Western Uniformity Scenario Analysis (Western Scenario)*, April 2004.

The fatal accident rate for LCVs could be even higher:

- LCVs - especially triples - have unusually poor stability performance. On one measure of stability - rearward amplification or the “crack the whip effect” - triples show more than 200% poorer performance than conventional tractor trailers (U.S. DOT Study, Volume III, Figure VIII-11).
- The safety risks of LCVs are compounded by their incompatibility with today’s crowded highways. Because they are so big and so slow, LCVs have trouble merging or changing lanes in freeway traffic. Similarly, they have problems maintaining speed on upgrades, creating serious safety risks. According to a University of Texas study, a 15 mile per hour speed differential increases accident risk nine times. *Source: An Assessment of Changes in Truck Dimensions on Highway Geometric Design Principles and Practices, The University of Texas Center for Transportation Research, 1981*
- LCVs create a larger crash area when involved in an accident. This crash area is often called the “crash footprint.” One factor contributing to LCVs’ greater crash footprint is their long length. Another factor is the danger of trailer separation. Studies have shown that trucks with multiple trailers are more likely to experience trailer separation. When trailers separate from the vehicle that extends the area of a crash.
- LCVs are likely to cause accidents as other motorists take evasive action to avoid them. LCVs will cause “systems” safety effects. Motorists are likely to try to avoid LCVs because they are perceived - accurately- to be unsafe. By speeding up, slowing down or changing lanes to avoid LCVs motorists will cause conflicts with other traffic that will not even show up on accident reports as truck-related incidents.

Heavier singles also pose unacceptable safety risks.

- Heavier tractor trailers will tend to have a higher center of gravity because the extra weight is typically stacked vertically. Raising the center of gravity increases the risk of rollovers.
- As the US DOT has said, increasing truck weight is also likely to lead to *brake maintenance problems and longer stopping distances*. (US Department of Transportation Comprehensive Truck Size and Weight Study, 2000 – “US DOT Study”) Roadside inspections continually show that brake adjustment levels are a serious issue. Since 1998, the Commercial Vehicle Safety Alliance has inspected more than 1.1 million brakes during its annual Operation Air Brake campaigns. Over 11% of the trucks inspected were placed out of service due to brake adjustment defects. Heavier singles often have an extra axle at the rear of the truck to prevent additional pavement damage, and on that axle are two additional brakes. The US DOT expressed specific concern about the ability to maintain those extra brakes. When brakes are out of adjustment, trucks can take longer to stop.
- Because of their extra axle heavier singles will be harder to steer. A third axle decreases the steerability of a truck by requiring sideways skidding of at least one of the rear axles. As a result, there is more pressure on the steering axle, increasing the risk of skidding and making emergency maneuvers more difficult.
- Heavier singles are likely to have poorer power to weight ratios – they accelerate more slowly and have difficulty maintaining speed on upgrades, increasing speed differentials with other traffic and increasing the risk of accidents. According to a University of Texas study, a 15-mile per hour speed differential increases accident risk nine times. *Source: The University of Texas Center for Transportation Research, 1981*



COALITION AGAINST BIGGER TRUCKS

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HEAVY TRUCKS PUT BRIDGES AT RISK

Bigger trucks increase the risk of bridge failure, accelerate bridge deterioration and add to the cost of maintaining highway infrastructure. Heavy trucks contribute to the deterioration of bridges, according to highway engineers.

Even without bigger and heavier trucks we are facing a national bridge crisis

- ◆ Our bridges are old. Almost half of the bridges on the National Highway System are more than 40 years old. (US DOT 2008 National Bridge Inventory)
- ◆ Our bridges are in poor condition. One of every four bridges – 151,397 -- in the nation is structurally deficient or functionally obsolete.
- ◆ Our bridges were designed when there were far fewer trucks. Forty years ago, when almost half of our bridges were built, there were about 2 million trucks on the road. Today, there are about 7 million trucks on the road.
- ◆ Our bridges were designed when trucks were much lighter. Until the mid-1970's, the legal limit on trucks was 73,280 pounds. Today it is 80,000 pounds. Supporters of bigger trucks want to increase truck weights to 97,000 pounds for single trailer trucks and over 100,000 pounds for double and triple trailer trucks.

Heavy trucks cause bridges to deteriorate

Engineers agree that heavy trucks contribute to the deterioration of bridges. Allowing heavier trucks will accelerate deterioration. Bridges are designed with a safety margin of error to ensure against bridge failure. Heavier trucks erode that margin of error and increase the risk of failure.

We cannot buy our way out of this problem

Money will not solve our bridge infrastructure problem because we are never going to be able to repair or replace all the bridges we need to, due to sheer lack of time and resources. It would cost \$188 billion to repair *current* structurally deficient bridges around the country. (US DOT Conditions and Performance Report, 2006)

Allowing heavier and longer trucks to operate on our roads would add new costs and increase the burden on taxpayers. Increasing truck size and weight would require that many bridges in the state be replaced, strengthened or posted – all of which would impose additional costs on the state and ultimately the taxpayer. Although the full extent of the damage to bridges from the operation of bigger trucks is unknown, the US DOT estimated that allowing LCVs nationwide would cost \$53 billion in capital improvements. (US DOT Comprehensive Truck Size and Weight Study, 2000)



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Groups representing large shippers and trucking companies are actively pushing for Congress to allow “higher productivity vehicles” on highways across the country. The American Trucking Associations (ATA) has put its support behind proposals to allow heavier single-trailer trucks and longer combination vehicles (LCVs) nationwide. Other groups such as Americans for Safe and Efficient Transportation (ASET) and the Agricultural Transportation Efficiency Coalition (AgTec) are pushing to increase the maximum gross vehicle weight on federal highways.

Specifically, the following increases are being proposed:

- **“Harmonization” of truck limits in western states**
- **97,000-pound six-axle singles at state option**
- **Lift 80,000-pound cap on five-axle trucks (“uncap federal bridge formula”)**
- **Lift LCV freeze to permit wider operations in the East**
- **Allow 111,000-pound 33-foot doubles at state option**

The typical truck on roads today (an 80,000-pound, five-axle single-trailer truck) pays for only 80% of the damage it does to our roads and bridges. With over 25% of US bridges already deficient, we cannot afford even bigger trucks that will pay even less of their costs.

Configurations		Gross Vehicle Weight	Trailer Length	Percentage of Costs Paid
Five-Axle Single		80,000 lbs	53 ft	80%
Six-Axle Single		97,000 lbs	53 ft	50%
Turnpike Double		129,000 lbs	106 ft	60%
Triple		110,000 lbs	85.5 ft	70%






Coalition Against Bigger Trucks, LLC

New Study Shows Short Lines at Risk of Huge Losses from Bigger Trucks

“Under the Most Aggressive Scenarios for increasing truck size/weights, the great majority of general merchandise traffic would be subject to diversion”

Bigger trucks would be devastating to Short Line and Regional railroads according to a study released on September 10, 2007, by Carl Martland, Research Affiliate, Department of Civil and Environmental Engineering, MIT. Martland concluded that Short Line Rail and Regional Rail operations would be heavily impacted from freight diversion if truck sizes and weights were increased, assuming that truck drivers and equipment (and highways) were available to handle the increase in truck traffic. The released results of the study showed that an increase in truck weight from the current 80,000 pound limit to 97,000 pounds could reduce short line merchandise traffic by 44% and overall short line traffic by 17%. Allowing long double and triple trailer trucks – LCVs – with weights up to 148,000 pounds could *eliminate 71% of the general merchandise traffic* and reduce overall short line traffic by 28%.

Truck Configuration	Decline in rail traffic merchandise	Total decline in rail traffic
 97,000 lb singles	44%	17%
 110,000 lb triples	28%	11%
 129,000 lb turnpike doubles	71%	28%



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Bigger Trucks Are Not Greener Trucks

Groups pushing for heavier and longer trucks claim that bigger trucks will help in the fight against global warming. In fact, the American Trucking Associations recommends increasing truck size and weight restrictions as part of its “bold sustainability program.”

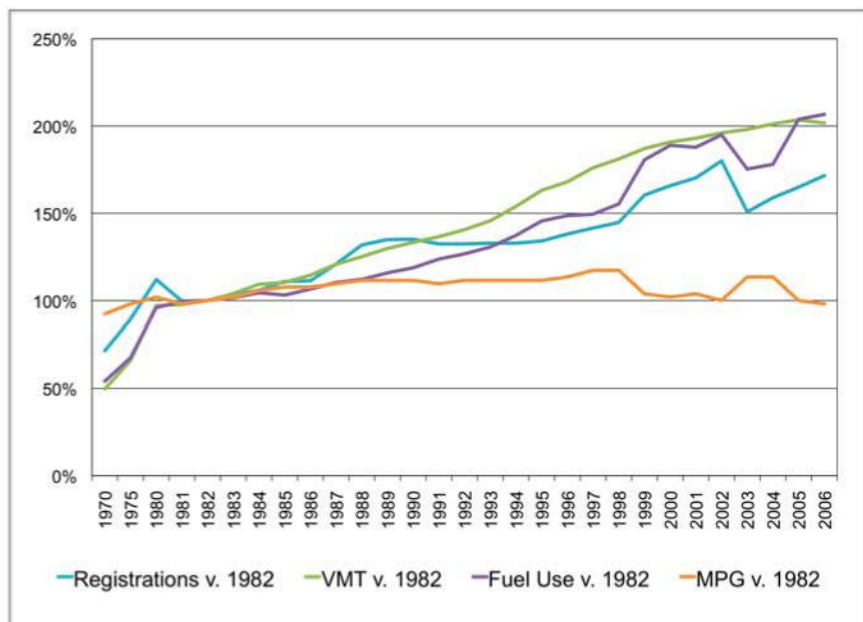
We commend efforts to reduce the carbon footprint of freight transportation, but greenwashing bigger trucks is not a solution. Allowing bigger trucks diverts freight from other, more efficient modes of transportation thereby increasing energy consumption, creating more pollution, and exacerbating existing highway congestion.

Bigger Trucks Do Not Mean Fewer Trucks

A centerpiece of the trucking industry's new campaign is the assertion that bigger trucks will mean fewer trucks. Research and experience shows that this is false. Truck travel grows after an increase in truck size and weight because the bigger rigs divert freight from other modes.

Since Congress last increased the gross vehicle weight limit in 1982, truck registrations have increased 72%, vehicle miles traveled and gallons of fuel burned by trucks have more than doubled, and average mileage traveled by a truck per gallon of fuel is the same.

Increases in truck size and weight are likely to accelerate growth in truck transportation, not decrease it. As such, allowing bigger trucks would represent a fundamental strategic decision that would shape the future of freight transportation in the United States for years to come.



Bigger Trucks Mean More Fuel Consumption

As the number of trucks on the road and the miles they drive have increased, so, too, has the amount of fuel consumed by big trucks because heavy truck fuel economy has remained relatively flat. In fact, the transportation sector accounted for over two-thirds of all U.S. petroleum consumption in 2006 and big trucks consume 18.7 percent of U.S. transportation energy.¹

¹ Transportation Energy Data Book: Edition 27, U.S. Department of Energy (DOE), 2008, Table 1.13, p. 1-17, and Table 2.7, p. 2-9.

Other modes of freight transport are far more efficient. For example, railroads can move cargo nearly four times as far as trucks on a single gallon of fuel. From an energy intensity perspective, rail consumed 11.6 times less energy per ton-mile and waterborne commerce consumed 8.5 times less energy per ton-mile than heavy truck transport in 2002.²

Allowing bigger trucks will increase fuel consumption because larger truck configurations are less fuel-efficient and because bigger trucks will divert freight from more efficient modes.

Bigger Trucks Mean More Emissions

Transportation sector emissions from gasoline and diesel fuel combustion generally parallel total vehicle miles traveled.³ In 2007, transportation accounted for 28 percent of U.S. greenhouse gas emissions and 21 percent of transportation greenhouse gas emissions were from freight trucks.⁴ Since 1990, the rate of growth of greenhouse gas emissions from freight sources has been more than twice as fast as emissions from passenger sources, “due largely to the rapid increase in emissions associated with medium- and heavy-duty trucks.”⁵ Additionally, heavy trucks account for one third of U.S. mobile source NOx emissions and nearly a quarter of mobile source PM-10 emissions.⁶

Other modes of freight transport emit significantly fewer pollutants, including greenhouse gases, than do trucks. For example, rail emits only one-third the pollutants as trucks per ton-mile.

To reduce the effect of freight movements by truck on air quality, the Federal Highway Administration (FHWA) recommends reductions in tare weight, aerodynamic improvements, and reduced idling overnight and at pick-up and drop-off locations.⁷ (As of 2002, only 6 percent of heavy trucks were equipped with idle-reducing technology.⁸) Allowing bigger trucks would conflict with each of these strategies because bigger payloads require bigger and heavier truck tractors to pull them, longer combination vehicles reduce the aerodynamics of the truck-tractor combination, and increased highway congestion attributed to bigger trucks will increase idling.

Bigger Trucks Increase Congestion

In congested conditions, all vehicles idle and emit noxious fumes into the air. As congestion worsens, so does the amount of idle time.

Big trucks are already major contributors to highway gridlock because they are larger and, more importantly, accelerate more slowly than passenger cars. Thus, trucks have a greater effect on traffic flow than passenger cars. “On level terrain and in uncongested conditions, conventional trucks may be equivalent to about two passenger cars, but on hilly or mountainous terrain and in congested traffic, their effect on traffic flow is much greater and may be equivalent to 15 or more passenger cars.”⁹ Bigger trucks would take up even more room on the highway because of their larger size and because of the increase in payload, they would have even greater difficulty accelerating, decelerating, and maintaining speed on upgrades.

² Independent calculations based on data from DOE; Tables 2.16, 5.1, 5.2, and 5.12.

³ Emissions of Greenhouse Gases in the United States 2007, Energy Information Administration, December 2008, p. 19.

⁴ Inventory of Greenhouse Gas Emissions and Sinks: 1990-2007, Environmental Protection Agency (EPA), April 2009, p. 2-20.

⁵ EPA, p. A-122.

⁶ Assessing the Effects of Freight Movement on Air Quality at the National and Regional Level, U.S. Federal Highway Administration (FHWA) Office of Natural and Human Environment, April 2005, Table ES-1.

⁷ FHWA, Tables ES-5 and ES-6.

⁸ DOE, Figure 5.2, p. 5-12.

⁹ Western Uniformity Scenario Analysis, U.S. Department of Transportation, April 2004, p. VIII-3.

The Martland study analyzed a hypothetical set of 100 origin-to-destination freight movements representing a typical mix of commodity and customer characteristics that are handled by short lines. The study looked at trip distances of from 50 to 1,200.

A total of nine different truck configurations and weights were considered ranging from increasing the load limits on existing tractor-trailer combinations from 80,000 pounds to 90,000 pounds to the heaviest long double trailer trucks weighing 148,000 pounds.

Earlier government and industry studies had shown that increasing truck size and weight would divert substantial portions of Class I freight from rail to the highways. The diversion problem, however, is even more serious for the Short Line and Regional rail operations. Trucks are more competitive with rail on the shorter hauls and short line railroads have higher proportion of their traffic in the categories most subject to diversion, i.e. less coal and more general merchandise.

Bulk Traffic Also at Risk

Larger trucks would become a more serious competitive threat for bulk rail freight for distances up to 300 miles. The threat is greatest where rail freight service is least efficient, whether because of high circuitry, short trains, expensive track structure, or inefficient facilities for loading and unloading - problems which are generally more serious for the short lines than for the Class I railroads.