



# MICHIGAN TRUCKING ASSOCIATION

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*Sent via electronic mail only*

March 17, 2021

***RE: Support for Infrastructure Funding Solutions;  
Concerns with Truck-only VMT***

The Honorable Debbie Stabenow  
Senator, State of Michigan  
731 Hart Senate Office Building  
Washington, DC 20510

Dear Senator Stabenow:

On behalf of the Michigan Trucking Association (MTA) and the 239,220 trucking employees in our state, I write to discuss our shared goal of pursuing meaningful investments in infrastructure in the weeks and months ahead. The trucking industry is eager to work with you, Congress, and the Biden Administration to end the continuous cycle of underinvestment in our nation's infrastructure. A bold investment in infrastructure will improve the safety and functionality of our nation's transportation systems while reinvigorating a pandemic-stricken economy.

As that work begins in earnest, we want to convey our strongly held view that any infrastructure investment must be grounded in long-term, sustainable funding, based on mechanisms where all road users contribute to rebuilding and revitalizing the American transportation network. The trucking industry will aid in those efforts and welcomes the opportunity to contribute to infrastructure development in a meaningful and efficient way.

However, we strongly caution against discriminatory funding schemes that place the burden of supporting our infrastructure solely on the back of the trucking industry. Forcing the industry to cover the entire gap between available revenue and infrastructure funding needs will jeopardize economic stability, cripple our nation's

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supply chain and threaten to decimate recent economic gains. Moreover, it will irreparably fracture the broad stakeholder support that has facilitated the advancement of past highway bills. Therefore, any discriminatory funding schemes, like a truck-only “vehicle miles traveled” (VMT) tax, will be met with resolute opposition by the industry, and must be dismissed as a misguided and prejudiced funding gimmick.

Mandating that the trucking industry bear the brunt of our nation’s infrastructure investment via a truck-only VMT tax is unfair, imbalanced, and runs counter to public interest. In terms of feasibility, there are ample reasons why a truck-only VMT is an ill-conceived and dangerous solution. First, experts agree that proper implementation of a VMT tax will require at least five to ten years to generate revenue because the relevant technology has yet to be fully developed, large-scale field testing has not been conducted, data privacy and security issues have not been addressed, and VMT enforcement mechanisms have not been implemented to combat anticipated evasion. Second, current review of VMT fee pilot programs estimates that collection costs could be as high as 40 cents on the dollar. While full implementation will likely bring these costs down substantially, these estimates suggest collection costs could still be as high as 15% – more than 70 times greater than the cost to collect the fuel tax. Third, a VMT fee would require individual accounts for each taxed vehicle, which, if applied to all road users would affect approximately 270 million vehicles, creating a daunting administrative boondoggle to implement and oversee. Fourth, there is an assumption that electronic logging devices (ELDs), which are currently required in only 28% of commercial motor vehicles, can be used to track miles for the purpose of imposing a VMT fee. However, federal law prohibits government agencies from using ELDs for any purpose other than Hours of Service compliance.

The trucking industry stands ready and eager to work hand-in-glove with Congress and the White House towards stemming our deepening infrastructure crisis. As you and your colleagues work to advance meaningful infrastructure legislation, we urge you to consider funding mechanisms that are built around a system where all who benefit from the transportation system contribute fairly. And we emphatically caution you against the pursuit of discriminatory funding mechanisms such as a truck-only VMT, which will seriously impede efforts to enact meaningful infrastructure legislation this Congress.

For a more fulsome documentation of the dire consequences of an irresponsible shift to a VMT tax, the American Transportation Research Institute (ATRI) has just recently completed a comprehensive report entitled, “A Practical Analysis of a National VMT Tax System.” The full report is available for download at this link: [A Practical Analysis of a National VMT Tax System - TruckingResearch.org](#). (I have taken the liberty of attaching the concise ATRI Executive Summary of this comprehensive report



with this correspondence, and I expect that this material will shortly be delivered to your office from the American Trucking Associations.)

Thank you for your attention and thoughtful consideration of this important and timely matter. Please do not hesitate to contact me for any additional information or insight on this topic.

Sincerely,

A handwritten signature in black ink that reads "Mickey Blashfield". The signature is written in a cursive, flowing style.

**Mickey Blashfield**

*President & CEO*

**Michigan Trucking Association**

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Attachment: *Executive Summary-A Practical Analysis of a National VMT Tax*