

Paper by
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American Association of
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The necessity for and importance of this organization have in my judgment suddenly taken on an entirely new significance. Federal legislation in the field of regulation of motor vehicle operation which has now become a fact, has made this organization essential if there is to be the most effective cooperation established between the States and the Federal Government. I understand that the Motor Carrier Act of 1935 will constitute one of the principal topics of this year's program. It is not my purpose, therefore, to go into this subject proper, but rather to suggest that the future of your organization can be predicted in a general way by the history of the American Association of State Highway Officials. This latter group, composed of the active officials of the State highway departments, has occupied a position through the years with relation to highway construction and maintenance that is analogous to that which is to be occupied by the American Association of Motor Vehicle Administrators with relation to the use of the highways by motor vehicles.

In considering the operations of the Federal Bureau of Public Roads, I can conceive of no way in which the cooperative relationships between the States and the Federal Government in the now very extensive program of road improvement could have been successfully assured, except through the pooling of efforts and interests in the official national highway organization.

There has been a constant growth in the establishment of desirable uniformity in technical matters, the promotion of research, the distribution of public information and the perfecting of Federal and State contacts. An effective attack is being carried forward upon unimproved and inadequate highways in such a manner that the major work in each State, by supplementing that of other States, results in a cohesive national program of road improvement rather than a series of 48 independent and unrelated improvement programs.

Since this meeting is not primarily concerned with highway improvement as such, two of the accomplishments of the highway officials' organization seem to me in particular the most important in considering the future activities and influence of this organization.

The first of these is the establishment of a common meeting ground where Federal and State administrative and technical policies may be brought into accord without the necessity of relying upon their respective legal authority. It has, to me, been one of the outstanding accomplishments, that, in a field where State and Federal interests are so intimately concerned, resort to the courts to determine matters of jurisdiction, authority or procedure has been practically non-existent.

A second notable accomplishment of greatest import here has been the establishment of a generous interest and mutual concern in the welfare of all the units composing the organization. Thus the results of research, technical information and any assistance possible, have been made freely available by and to all of the units.

While there are many interests common to all the highway departments of the States, the importance of Federal legislation and Federal aid appropriations has held such a deep significance that these have provided a common bond to stimulate adherence to, and activity of, the national organization.

As I have stated, it now appears that this Federal motive has been supplied in the case of this organization, and I feel confident that other Federal authorities who are directly concerned in the administration of the new Motor Carrier Act will lend every encouragement to the future successful activity of this group.

Your Association in its first years has been fortunate in having officers who see the important work ahead that can only be accomplished through an orderly general attack upon the problems related to transportation by motor vehicle. Our principal contacts have been with Mr. George R. Wellington of Rhode Island, President, and Mr. L. E. Wallace of Iowa, Secretary-Treasurer. They have directed their efforts to the establishment of the four regional groups and the formulation of committees to carry forward the work of the Association in a systematic and thorough manner. The six main committees of the Motor Vehicle Administration constitute the following:

1. Committee on Cooperation with the American Association of State Highway Officials (joint committee).

2. Accounts and Records, with jurisdiction to consider:

- a. Development of office routine for the issuance of titles, registrations, and operators' licenses and renewals thereof.
- b. Uniform method of classifying the several types of registerable vehicles.
- c. Accounting system for fees received.
- d. Classification or designation of various types of employees, such as counter clerks, checkers, typists, filers, bookkeepers, cashiers, etc.
- e. Methods for determining costs of issuing
 - (1) Titles
 - (2) Registrations
 - (3) Operators' licenses.
- f. Methods for recording reports of stolen cars and exchange of such information with other States.

3. Accident Research and Prevention, with jurisdiction to consider:

- a. Uniform accident reporting system.
- b. Method of preparing accident statistics.
- c. Study of accident causation.
- d. Development of measures for accident prevention.
- e. Development of education - adult and child.

4. Administration and Enforcement, with jurisdiction to consider:

- a. Consideration of assembling and reconciliation of point of view on the best means of exercise of Administrator's power to suspend and revoke licenses.

- b. Methods of examination of applicants for operators' licenses.
 - c. Policies of law enforcement.
5. Legislation, with jurisdiction to consider:
- a. Study of laws of the various States on the standpoint of bringing them into harmony with the Uniform Codes.
 - b. Reduction of the phraseology of the Codes into sub-items of principles most essential for adoption.
6. Reciprocity and Taxation, which would attempt to find a basis on which an exchange of reciprocal relationships could be entered into by the various States. The exchange of reciprocal privileges between States seems to include considerable diversification in allowable weights and methods of taxing motor vehicles for the use of the highways. Therefore, the consideration of taxation can hardly be divorced from a consideration of reciprocity.

In the outline of work proposed for these committees, there are activities which will promote efficiency and uniformity in the methods of administering the motor vehicle department in each State. These relate to the conduct of the office as a unit within itself. There are other activities which are necessary to, and a component part of, the broader relationships of regulation and control of motor transportation. Perhaps the greatest public interest lies at the moment in the scope and content of Federal regulations to be issued under the new Motor Carrier Act and in any measures to promote highway safety. As a general commentary, there is much unnecessary confusion of problems. Through the multitude of dissimilar State laws related to various aspects of this whole subject relatively simple problems have become unnecessarily complicated.

If there is to be sound administration, there must be a high degree of simplification and the establishment of nation-wide uniformity. The cause of safety will be advanced materially, in my judgment, by the same approach that gives a better classification and a simpler basis for the registration of motor vehicles, particularly in the

heavier classes. The collection of fees from road users will be placed on a relatively much fairer scale through the same means. It is possible to define the inter-relationships of the many widely varying aspects of highway transportation as an entity, all of which will be improved by a more rational, practical approach to the subject of governmental regulation and control, whether State or Federal. Objectives should be specified rather than methods. In the fundamental philosophy of control by the public of motor transportation, there are two general phases. First, the physical, and second, the economic.

In the physical phase, the dimensions, speeds, types and weights of the individual vehicles are important to the public. In the economic phase, efficiency and costs of highway transportation are of public concern. This latter phase includes such complicated matters as real versus apparent economies in competitive types of transportation. The fact that these two phases are realities should be honestly recognized, and the solution of the problems in each field approached honestly and scientifically.

There are now many examples of legislation advanced under the guise of proper and necessary regulations in the physical field which have, in fact, no sound support in this field. The real purpose behind such legislation has been to meet, or attempt to meet, an economic situation. This is neither an honest nor principal approach to the problem. One of the committees of your Association which has been established is the Committee on Cooperation with the American Association of State Highway Officials. Through the operation of a joint committee it is proposed to bring to bear upon problems effecting relationships between the vehicle and the highway the consideration of public officials who have responsibility in both fields. There has been a long effort made by the American Association of State Highway Officials in cooperation with users of the heavier vehicles, manufacturers and others interested in bus and truck transportation in the development of a specification which would define and limit the size and weights of motor vehicles for which the highways and bridges are to be designed and constructed. Many years of earnest effort have gone into the development of the code which has now received general acceptance insofar as it has been developed except for one feature. This feature is not important in the design of highways except as a limitation. Generally speaking, the code has been developed to the point where it is sufficient for the highway engineer. It is not in my judgment sufficient for the motor vehicle administrator.

There could be no better illustration of the criticism here made of the wide variation in State laws relating to the same subject than the elements which have been written into the laws as the basis for the registration and payment of fees for the heavier motor vehicle, particularly trucks. As an illustration of what can be done toward simplification, there are only two elements which should be taken into consideration in registering or fixing the fees for the heavier vehicles. These are wheel or axle loads and gross weight. The adoption of these two elements to the exclusion of all others would at once place registration between the States on a uniform basis and one in which the registration fees charged would be comparable. Once established on this basis, the enforcement through the highway patrol is reduced to its simplest possible terms. It is only necessary to run the vehicle over scales which should be permanently installed and made a part of the equipment of every important highway route. Yet lacking such permanent equipment the use of the portable scales is readily available.

Once axle loads and gross weight are fixed as the basis for registration, there must be developed certain other required specifications for several purposes, the major one being the promotion of highway safety. I refer to specifications for brakes and power. Here again simplification of the problem will dictate a performance test which can be readily certified to by the manufacturer for new vehicles. Where suspicion as to vehicles in operation exists a field test can easily be made by the individual patrolmen. One feature should be mentioned in connection with wheel or axle load, that is, tire equipment. When wheel or axle load, tire equipment, gross load, brakes and power are brought into the proper ratio, the latter two through the performance test specified, we have all of the elements that are necessary for registering, for the fixing of fees and for the enforcement of the law without the introduction of a single requirement that cannot be readily tested in the field by the individual highway patrol officer.

Through a study made by the Bureau of Public Roads we have found there are actually more 1-1/2 ton rated capacity trucks on the roads carrying a 5-ton load than there are 5-ton trucks carrying a 5-ton load, one important difference to the public being that the 5-ton trucks are registered and paying fees in that class while the 1-1/2 ton trucks are registered and paying fees in the lower class. The loss in revenue alone in the 1-1/2 ton to 3-ton trucks now operating with heavy overloads will run into large figures.

From the safety angle there is no need to point out the hazard to vehicles equipped with brakes and power only adequate to handle a fraction of the actual gross load. It is not necessary to go into this subject further. The whole purpose of my appearance has been to point out the great necessity for this Association, for active work by its committees, and to pledge the full cooperation of the Bureau of Public Roads in furthering the work of the Association along the lines proposed to be undertaken by the committees. So vitally important do we feel this work to be that I pledge the fullest possible cooperation of the Bureau of Public Roads with the various committees during the ensuing year.