AMERICAN TRUCKING ASSOCIATIONS
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February 17, 2026

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

Dear Administrator Zeldin:

The American Trucking Associations (ATA) appreciates the commonsense approach to environmental regulation that the U.S. Environmental Protection Agency (EPA) is taking under your leadership. EPA's commitment to engage industry stakeholders and reevaluate existing regulations will help to ensure environmental protections are appropriately balanced with the need to sustain economic growth and industry competitiveness.

I am writing regarding EPA's reevaluation of 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). We appreciate your staff's engagement and EPA's commitment to review the rule's extended warranty and useful life provisions.[1] We remain concerned that the heavy-duty NO_x rule imposes significant burdens at a time when the trucking industry continues to contend with a prolonged freight recession and inflationary pressures. ATA requests that EPA consider improvements that would reduce cost and complexity and ensure that any new technology that trucking is forced to adopt is reliable.

New emission control technologies required on model year (MY) 2027 trucks are unproven on the highway, and the trucking industry is concerned that a premature rollout will disrupt our ability to efficiently move freight. The lack of compliant prototype engines and pre-production models has stalled the technology trials that normally preceded major new emissions standards. Fleets' inability to complete operational testing leaves them unable to plan for maintenance, training, or performance impacts. This absence of real-world

[1] Szabo, Aaron. "EPA will keep its foot on the gas in 2026, ending burdensome regulations." *The Hill,* 19 December 2025. Op-ed.

testing raises serious concerns about downtime, service disruptions, and wider supply chain impacts.

The Clean Air Act permits EPA to grant non-conformance penalties (NCP) under such circumstances. With the market introduction of MY 2027 heavy-duty trucks only months away, NCPs for the heavy-duty market would give manufacturers additional time and a level playing field to run real-world testing on the newly required emission control systems. Simultaneously, NCPs would allow the continued sale of proven, environmentally sound technologies that deliver dependable emissions performance and reliability for fleets. NCPs are temporary by nature, and penalties that decrease as the degree of non-compliance decreases ensure an eventual technology transition.

Credit market flexibility can also ensure manufacturers remain in compliance while supplying proven technologies to the new truck market. ATA recommends EPA consider flexibilities that expand credit life, credit trading, and credit use across different vehicle classes. Credits earned represent real emissions reductions, and EPA should ensure credits are not unduly limited, discounted, or forced to expire.

The current heavy-duty NOx standards would pose a significant challenge for the trucking industry, likely sparking a "pre-buy" that spreads additional costs across the trucking industry. Providing NCPs and credit market flexibilities for the heavy-duty market would help by blunting the disruptive impacts created by frontloaded demand.

Thank you for your continued leadership and engagement on this critical issue. We look forward to working closely with you and your team to achieve a solution that protects both our environment and the vitality of the trucking industry.

Sincerely,

Chris Spear
President & CEO
American Trucking Associations