



February 9, 2021

Via email

Centers for Disease Control and Prevention
Department of Health and Human Services
c/o U.S. Department of Transportation
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Requirements for Persons to Wear Masks While on Conveyances and at Transportation Hubs

Thank you for the opportunity to provide feedback on the Centers for Disease Control and Prevention's (CDC) notice and order regarding the requirement to wear masks while on conveyances and at transportation hubs. ATA appreciates the efforts the CDC has taken to address workplace safety in our industry.

ATA strongly supports the use of face coverings when in public areas, including transportation hubs. However, CDC may want to revisit the apparent blanket requirements that truck drivers, other than those operating solo, wear face coverings in the truck at all times during team driving operations. As the administration uses science for its policy development, it is important that industry-specific data be considered before applying a one-size-fits-all solution.

Many team driving operations work together for days, if not weeks, at a time, and team drivers can and do reduce their exposure by maintaining proper social distancing best practices outside the truck cab. This includes, for example, choosing to eat meals and take rest breaks in the truck cab, limiting the amount of exposure to other individuals. Additionally, many team drivers are husband and wife teams, which are exempt generally under prior CDC recommendations, and ATA's suggestion is a logical extension of that prior decision.

Indeed, while face coverings within the cab for non-husband and wife team drivers at all times may seem logical, the effectiveness and utility of such a broad requirement may be limited. For instance, where drivers are within a confined space for days, if not weeks, at a time, wearing a face covering for almost 24 hours a day, even while in the shared sleeper berth, is not feasible or realistic nor likely to be particularly effective in preventing transmission. ATA had previously raised these concerns to the National Institute for Occupational Safety and Health (NIOSH). As a result, NIOSH removed the in cab mask requirement guidance for team truck drivers when they are part of the same household. Accordingly, ATA recommends that the current requirements not apply to team drivers as well.

Thank you for your consideration and support during these challenging and unprecedented times. Should you have any additional questions, or would like to discuss this matter further, please contact me at 703-838-8804 or dhorvath@trucking.org.

Respectfully,

Dan Horvath
Vice President, Safety Policy
American Trucking Associations