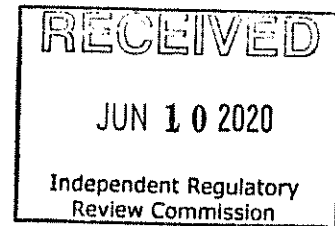


#3258



June 3, 2020

R. Scott Shenk  
Manager, Vehicle Registration Division  
Bureau of Motor Vehicles  
1101 South Front Street, 4th Floor  
Harrisburg, PA 17104  
[rshenk@pa.gov](mailto:rshenk@pa.gov)



RE: **Proposed Rulemaking – Registration Class Stickers**

Dear Mr. Shenk:

The Pennsylvania Motor Truck Association (PMTA) was organized in 1928. As part of a national integrated network of trucking associations and affiliates, we identify the key issues that impact the trucking industry and fight to preserve and strengthen the trucking industry and its jobs in each of the 67 counties and 2,567 municipalities in Pennsylvania.

The PMTA **strongly supports** the adoption of the proposed rulemaking which will delete the text of Chapter 55, which appears at 67 Pa. Code pages 55-1—55.3, serial pages (254023) to (254025).

In addition to the registration class sticker, a vehicle's weight classification is printed on the vehicle's registration card. The registration class sticker is not utilized by third parties, including law enforcement, when verifying the authorized operating weight of a vehicle. Instead, law enforcement relies on the registration card to determine the authorized operating weight of a vehicle. Therefore, the need for a registration class sticker no longer exists, and its elimination will result in administrative and cost savings to the Department and the regulated community.

PMTA has long supported the elimination of the registration class sticker, as Pennsylvania is the only state to require a weight class decal. This proposed rulemaking will benefit an estimated 1.6 million commercial and non-commercial vehicles currently required to display the registration class sticker.

The focus of Commercial Vehicle Enforcement in the late 1970's through the mid 1990's was "Size and Weight Enforcement." Pennsylvania did not begin to train officers or inspect commercial vehicles as part of a roadside program until 1985. The weight class decal is a guide that may provide an officer with a range of weight that a vehicle could be registered at and as stated above provided the officer a quick means of determining what a vehicle may be registered at as it crosses the scales.

However, as Pennsylvania has focused on "Safety" and moved somewhat away from weight, the methods used have changed as well. Officers are no longer sitting at a scale facility observing weights of vehicles; rather, they are focusing on safety violations. As an example, Pennsylvania's one and only permanent weigh station located along Interstate 80 at Mile post 56 has fallen into a state of disrepair and is no longer utilized for size and weight enforcement. This is also true in that enforcement teams are

not utilizing the semi-permanent weigh stations in certain rest areas to conduct vehicle weighing; rather, they are using them to do commercial vehicle inspections. Moreover, some of the scales built into the rest area ramps at several of these locations have been removed as well.

With this change of focus, weight class decals serve almost no legitimate purpose and as previously stated are only applicable to Pennsylvania registered vehicles. Therefore, in November of 2015, PMTA representatives met with the Secretary regarding weight class decals and an ombudsman at the department to address trucking related issues. In PMTA's discussion with the department it was determined that these decals serve almost no legitimate purpose (see attached letter from Secretary Leslie Richards dated April 27, 2016). Driver's whose vehicles fail to display this sticker are subject to penalties. Moreover, if a carrier has a windshield replaced, they must obtain a new decal from the department.

Finally, there are department issued forms that must be completed, and the decals are issued by the department at no cost to the carrier. This is time consuming on the part of a motor carrier to replace a decal that serves no legitimate purpose and is costly to the department.

Again, PMTA respectfully offers its support for this proposed rulemaking. If you should have any questions, please do not hesitate to contact me at (717) 761-7122 ext. 107 or [jbutzer@pmta.org](mailto:jbutzer@pmta.org).

Very truly yours,  
Pennsylvania Motor Truck Association



Joseph A. Butzer  
Interim President

## Stephen Hoffman

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**From:** Mike Pavlishin <mike.pavlishin@credentialleasing.com>  
**Sent:** Thursday, June 4, 2020 1:22 PM  
**To:** Shenk, Scott  
**Subject:** [External] FW: Elimination of Weight Class Stickers

***ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to [CWOPA\\_SPAM@pa.gov](mailto:CWOPA_SPAM@pa.gov).*

**From:** PMTA [mailto:[admin@pmta.org](mailto:admin@pmta.org)]  
**Sent:** Thursday, June 4, 2020 1:15 PM  
**To:** Mike Pavlishin <mike.pavlishin@credentialleasing.com>  
**Subject:** Elimination of Weight Class Stickers



Dear Michael Pavlishin,

In March of 2015 our Legislative Committee put forth an agenda of regulatory and legislative issues PMTA wanted to get addressed on behalf of our members with Government and the Legislature. On that agenda was the elimination of Weight Class Stickers. Now, after 5 years of working on eliminating these stickers, we are on the final lap to get this accomplished and I am requesting your assistance.

All I am asking is that you take a moment to send an email to Mr. Shenk at the Bureau of Motor Vehicles and state that **you support the elimination of Registration Class Stickers.** (email address below)

R. Scott Shenk

Manager, Vehicle Registration Division

Bureau of Motor Vehicles

1101 South Front Street, 4th Floor

Harrisburg, PA 17104

[rshenk@pa.gov](mailto:rshenk@pa.gov)

Put this on the subject line **Proposed Rulemaking – Registration Class Stickers**

Email can be this simple **I support the elimination of Registration Class Stickers.**

([Click here](#) to review the Proposed Rulemaking if you care to read the document)

Getting this accomplished is personal for me. I was part of PMTA's Legislative Committee back in 2015 when we voted to make eliminating these useless stickers one of our goals.

As I said above, we are in the final lap so please consider sending an email to get us across the finish line.

My sincere thank you in advance for your time.

Pennsylvania Motor Truck Association

Joseph A. Butzer

Interim President

[Unsubscribe](#)



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION  
HARRISBURG, PENNSYLVANIA 17120

*AR*

OFFICE OF  
SECRETARY OF TRANSPORTATION

*KEVIN*

April 27, 2016

James W. Runk, President  
Pennsylvania Motor Truck Association  
910 Linda Lane  
Camp Hill, PA 17011

Dear Mr. Runk:

*Jim*

This is in response to your correspondence dated March 8, 2016, as a follow up from our meeting on November 12, 2015.

I am happy to inform you, the Department has determined the weight class sticker is no longer needed and has drafted a regulatory update package to remove the requirement. However, please be advised, the process of modifying regulations does take some time.

You also requested an Ombudsman for the industry representing the entire Department. I will have Glenn Rowe, P.E., Chief, Highway Safety and Traffic Operations Division, contact you to discuss your expectation more in-depth and how we can provide a single point of contact to best service your needs. Mr. Rowe's telephone number is 717.783.6479.

Sincerely,

*Leslie*

Leslie S. Richards  
Secretary of Transportation