

April 2, 2020

The National Waste & Recycling Association (NWRA) requests that your state's motor vehicles agency or department address the issue of new waste and recycling truck registration and license plate issuance during the COVID-19 declared national emergency.

While we have found the states to be flexible on extending current registrations, the issuance of first-time registrations and plates for new vehicles has yet to be addressed. NWRA members are faced with state department of motor vehicles offices closing or limiting hours. This in turn has impacted their ability to acquire new registrations and plates. As a result, new trucks, which generally are more efficient and could be of great value to communities during this public health crisis, are sitting idle.

The Federal Motor Carrier Safety Administration (FMCSA) has established a precedence for states to follow with its decision to exercise agency discretion and determination not to enforce the Temporary Operating Authority Registration fee provisions of 49 C.F.R. 360.3T(d)(2) and (f)(6) in order to provide direct assistance to emergency relief efforts pursuant to the Regional Emergency Declaration 2020-002 issued following the declaration of emergency by the President under 42 U.S.C. § 5191(b) related to outbreaks of Coronavirus Disease 2019 (COVID-19).

We ask that you work to find a solution that best fits your state and our industry's need to deploy new vehicles within their fleets during this pandemic. NWRA urges quick consideration of this request so that our members can continue providing these essential services for the public health. Should you have any questions, please contact Jim Riley at 202-364-3744 or [jriley@wasterecycling.org](mailto:jriley@wasterecycling.org).

Thank you for your consideration.

Sincerely,



Darrell K. Smith, PhD  
President and CEO