May 6, 2026

David M. Sutula
Acting Associate Administrator
Office of Research and Registration
Federal Motor Carrier Safety Administration

RE: Docket No. FMCSA-2025-0787 – Information Collection Request: *Quantifying the Benefits of Creating New Truck Parking Spaces*

Dear Mr. Sutula:

NATSO, Representing America's Travel Centers and Truck Stops ("NATSO" or the "Association")[1] appreciates the opportunity to provide these comments on the Federal Motor Carrier Safety Administration's ("FMCSA" or the "Agency") proposed information collection regarding the quantification of benefits associated with expanding truck parking capacity.[2] Private travel centers and truck stops provide more than ninety percent of publicly available truck parking in the United States today. Our industry is well attuned to what professional drivers need as they travel the U.S. Interstate system – and where they need it. NATSO's members have deep understanding of the economics undergirding the truck parking marketplace in the United States today. Truck parking challenges in the United States are not national in scope – they are localized market failures driven by misaligned incentives, high-cost metropolitan constraints, and regulatory barriers. NATSO's members are eager to share their perspective with FMCSA as the Agency pursues policy solutions to address these challenges.

I. INTRODUCTION

FMCSA's analysis of the information collected, and any subsequent policy responses, should recognize that while there are well-documented truck parking shortages in certain regions and corridors, the evidence does not support that there is a uniform, nationwide shortage of truck parking capacity. Truck parking constraints are highly localized and corridor-specific. Policymakers must recognize this reality, identify specific regions where shortages exist, and then target solutions to address the specific challenges that exist in those areas.

FMCSA also must accurately understand the costs of providing truck parking. These costs typically range from $10,000 to $50,000 per space when managed by the private sector, and several times that amount when the investment is overseen by government agencies. These financial obstacles can be overcome by a combination of financial support and heightened return-on-investment prospects for those who build and maintain truck parking spaces.

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[1] NATSO is the preeminent trade association representing travel centers and other off-highway fuel retailers and businesses. NATSO currently represents approximately 5,000 travel plazas and truck stops nationwide, comprising both national chains and small, independent locations.

[2] U.S. Department of Transportation, Federal Motor Carrier Safety Administration, Agency Information Collection Activities; Approval of a New Information Collection Request: "Quantifying the Benefits of Creating New Truck Parking Spaces, Notice and request for comments," 91 Fed. Reg. 17324 (April 6, 2026), *available at:* https://www.federalregister.gov/documents/2026/04/06/2026-06597/agency-information-collection-activities-approval-of-a-new-information-collection-request

FMCSA should properly diagnose the nature of truck parking shortages where they exist. Shortages are not the result of insufficient capability or desire by the private sector to build and maintain parking. Rather, it reflects a market failure driven by, among other things, misaligned incentives within the trucking industry.

Truck parking is a necessary input into freight movement. However, the user, payer, and beneficiary are not aligned. Motor carriers do not incorporate truck parking into their operational cost structures the way they do with fuel through negotiated fuel contracts. If they did, the private market would respond rapidly and efficiently with increased capacity. The private sector has repeatedly demonstrated its willingness to invest in expanded parking where a viable return on investment exists.[3]

Above all, the best way to ensure that truck parking availability continues to grow is to ensure that private truck stops remain profitable. Truck stops and travel centers add parking capacity only when it is economically defensible to do so. Under the current market paradigm, truck parking itself is not a direct profit center for these facilities. Instead, it is supported by revenues generated from other profit centers (*e.g.*, fuel sales, food service, convenience and other in-store purchases, and maintenance operations). The business environment for the broader operation must be healthy and stable for private operators to invest in additional parking capacity.

Allowing commercial activities at rest areas would undermine, rather than support, efforts to increase truck parking capacity nationwide. The private sector currently provides most of the truck parking in the United States, and it does so through a business model in which parking is supported by revenue from fuel, food, and other retail services. Introducing government-sponsored commercial activity at rest areas would divert that revenue away from existing truck stops and travel centers, thereby weakening the very lines of business that underwrite truck parking investments.

FMCSA's information collection should be designed to identify location-specific shortages, capture the cost structure and constraints facing private providers, and evaluate how industry practices—particularly fleet reimbursement policies—affect parking availability.

II. THE TRUCK PARKING CHALLENGE IS REGIONAL, NOT NATIONWIDE

FMCSA should accurately characterize the nature of truck parking availability across the United States. The evidence does not support the conclusion that there is a single, nationwide shortage of truck parking capacity. Rather, parking constraints are highly localized and corridor-specific. The most severe constraints arise in and around major metropolitan areas, where high land costs intersect with stringent and inflexible shipper and receiver schedules, and where zoning restrictions, land-use policies, and community opposition create complex, time-consuming, and costly barriers to developing new truck parking capacity.

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[3] *See* U.S. Department of Transportation, Federal Highway Administration, Office of Freight Management and Operations, Jason's Law Commercial Motor Vehicle Parking Survey and Comparative Assessment (December 1, 2020), *available at:* https://ops.fhwa.dot.gov/Freight/infrastructure/truck_parking/coalition/2020/mtg/jasons_law_results.pdf (2019 Jason's Law survey revealing that over a five-year span (2014-2019), national truck parking spaces increased in both public (6%) and private facilities (11%); *see also* American Transportation Research Institute, "Expanding Truck Parking at Public Rest Areas" (April 2025), *available at*: https://truckingresearch.org/2025/04/expanding-truck-parking-at-public-rest-areas/

A. **Proximity to Major Metropolitan Areas**

Most truck parking challenges tend to be in close proximity to major metropolitan regions, where freight demand is highest, delivery activity is tightly scheduled, and drivers must comply with hours-of-service ("HOS") requirements near densely populated delivery points.[4] Shippers and receivers typically impose strict appointment windows for pickups and deliveries, often with little flexibility for early or late arrivals. Drivers who arrive too early are frequently turned away due to limited staging space, while those who arrive late may face rescheduling or financial penalties. As a result, drivers' ability to manage their HOS is complicated by the need to ensure they are positioned close enough to the delivery location to meet these narrow time windows.

This dynamic creates intense, localized demand for truck parking in the immediate vicinity of large cities, particularly during overnight periods when drivers are staging for early morning deliveries. Drivers prefer not to park too far from their destination, and also want to maximize their available HOS windows. This is why they are less likely to utilize parking located even modest distances away from their route or final stop.

B. **Land Costs, Zoning Restrictions, and Local Opposition**

The regions where truck parking demand is most acute—particularly in and around major metropolitan areas—are also the regions where it is most difficult and expensive to build new capacity. Land values in these areas are significantly higher than in rural or less densely developed regions. Truck parking is land-intensive and reliant upon ancillary, low-margin lines of businesses (such as fuel sales, foodservice, or convenience retailing) for viability. It is difficult for this model to compete in certain areas with alternative forms of land development (residential, commercial, logistics warehousing, etc.). These areas where demand is robust but the underlying economics make new projects infeasible is where government support and incentives should be targeted.

Zoning and land-use regulations compound the challenges for parking capacity near metropolitan areas. Many local jurisdictions either restrict or prohibit truck stop development. Where permitted, the approval process is often lengthy, uncertain, and expensive. Developers are often required to conduct extensive environmental and traffic studies and navigate complex, bespoke permitting regimes that can take years to complete. These governmental obstacles increase the cost and risk associated with developing truck parking, discouraging investment in those locations where it is most needed.

Community opposition also plays a significant role. Proposed truck parking locations frequently encounter resistance from nearby residents and local officials concerned about noise, traffic, emissions, or perceived impacts on property values. This "not in my backyard" (or "NIMBY") dynamic can delay projects or force developers to scale back or abandon plans altogether. It is not uncommon for local governments to condition approval on costly off-site improvements (such as roadway upgrades or interchange modifications) that further erode project viability.

Conversely, it is generally cheaper and easier to develop truck parking in rural or less populated areas because many of the primary cost drivers that are present in metropolitan regions are significantly reduced. Land is more abundant and less expensive; this allows developers to

[4] Hours-of-service requirements, while essential for safety, can intensify localized parking demand by limiting drivers' flexibility in determining when and where they are able to stop. This challenge is particularly acute in high-density freight corridors.

acquire larger parcels suitable for truck parking without competing against higher-value uses. Zoning and permitting processes tend to be more straightforward, with fewer restrictions on truck-related uses and less need for variances and lengthy approvals. Finally, rural projects typically encounter less community opposition, reducing delays, legal costs, and the risk that a project will be scaled back or denied altogether. Infrastructure requirements may also be less burdensome, as traffic volumes are lower and there is less likelihood that developers will be required to fund major off-site improvements such as intersection upgrades or interchange expansions. These factors, taken together, make rural truck parking projects faster to execute, less risky, and more economically viable, even though demand for parking is more limited relative to higher-density metropolitan regions.

Policy solutions to truck parking challenges should recognize these realities and focus on helping the private sector overcome obstacles where they exist. Treating truck parking as a uniformly national shortage risks misallocating limited public resources to areas where private supply is adequate. Governments must take caution not to overbuild in lower-demand regions while failing to address acute shortages in higher-need areas. Well-intentioned policies risk undermining efficient private sector investment by distorting market signals. The Agency's objective should be to precisely identify and target locations with acute, persistent shortages. This reinforces the need for data collection efforts that are geographically granular and capable of identifying location-specific demand and utilization patterns.

III. UNDERCOUNTED TRUCK PARKING CAPACITY IN THE FREIGHT NETWORK

FMCSA's assessment of truck parking availability should account for the significant number of lawful, "off-network" parking spaces that exist throughout the broader freight ecosystem. In addition to dedicated truck stops and rest areas, drivers routinely utilize parking at warehouses, distribution centers, manufacturing facilities, retail locations, and industrial parks. These locations often provide staging or overnight parking in connection with freight activity, and in many cases are an integral part of how the supply chain functions on a day-to-day basis.

These spaces are not always captured in public datasets or formal inventories of "truck parking." Nevertheless, they represent a meaningful component of real-world parking supply. Omitting this additional parking capacity can lead to an overstated perception of shortages at the national level, even while localized constraints persist in specific corridors and metropolitan areas.

FMCSA has an opportunity to improve visibility and access to these existing parking resources. Data-sharing initiatives, real-time information platforms,[5] and partnerships between public agencies and private property owners could help connect drivers to available spaces more efficiently. It could also reduce unnecessary vehicle miles traveled in search of parking and alleviate congestion at more traditional truck parking facilities.

The Agency should consider incorporating these sources of parking into its data collection efforts and exploring policies that facilitate safe, legal, and efficient use of such spaces, while respecting property rights and operational needs of facility owners.

[5] *See, e.g.*, www.truckparkingclub.com (a company helping provide parking for truck drivers by monetizing vacant properties for landowners).

IV. COSTS OF PROVIDING TRUCK PARKING

Truck parking projects are both capital-intensive and operationally complex. They require significant upfront investment, coupled with substantial ongoing costs to maintain and operate the facility.[6] In addition, these projects demand large parcels of land—often acquired only after navigating lengthy zoning processes, regulatory hurdles, and, in many cases, local opposition that can delay or derail development.

NATSO members report that the cost to construct new parking capacity typically ranges from $10,000 to $50,000 per space, depending on various factors including land prices, site conditions, local labor costs, drainage and stormwater requirements, and regional weather patterns that affect long-term maintenance. When truck parking projects are managed by governmental entities rather than the private sector, per-space costs are much higher. For example, the Arkansas Department of Transportation spent $6 million to add 84 truck parking spaces on I-40 in 2023 (more than $70,000 per space).[7] This example is illustrative of a broader trend in which public-sector delivery of truck parking is materially more expensive than private sector development,[8] highlighting the importance of policy approaches that leverage private-sector investment, where truck parking can be delivered more efficiently and at substantially lower cost.

Preparing land for truck parking often involves: grading; paving with materials capable of supporting repeated usage by heavy-duty trucks; installing lighting and security infrastructure; and ensuring compliance with environmental and permitting regulations. In colder climates, operators must also account for higher lifecycle costs due to snow-removal and more rapid pavement deterioration. In many cases, developers must upgrade or extend utilities to access roads, further increasing project costs.

Beyond construction, truck parking providers face other costs and regulatory burdens. Securing permits can require extensive traffic studies and environmental reviews. Zoning approvals may require variances or rezoning efforts, particularly in areas where truck-related uses are disfavored. Approvals can also be conditioned on costly off-site improvements, such as intersection upgrades or interchange modifications. When these obstacles exist alongside high prices for land, the economics of providing free truck parking are frequently less compelling than alternative use cases.

Once constructed, truck parking facilities generate ongoing operational expenses that must be sustained over time. These include maintenance of pavement and striping, lighting and security systems, insurance and liability coverage, waste removal, and general upkeep to ensure safety and

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[6] **Increasing allowable truck weights would further raise both construction and lifecycle maintenance costs for truck parking facilities.** Pavement deterioration is not linear with weight; even incremental increases in axle weight result in disproportionately greater pavement damage. Heavier vehicles accelerate deterioration, shorten pavement life cycles, and increase the frequency and cost of resurfacing and reconstruction. As a result, policies that expand allowable truck weights would materially increase the long-term cost of providing and maintaining truck parking capacity, particularly for privately financed facilities that must absorb these costs directly. These cost implications should be accounted for in any comprehensive assessment of truck parking supply and investment needs, including any Congressional consideration of increases to maximum allowable truck weights.

[7] Arkansas Department of Transportation, "ARDOT to Cut a Ribbon on I-40 Truck Parking Expansion," news release, May 30, 2023, *available at*: https://ardot.gov/news/23-165/.

[8] *See generally* American Transportation Research Institute, Expanding Truck Parking at Public Rest Areas (April 2025), *available at*: https://truckingresearch.org/2025/04/expanding-truck-parking-at-public-rest-areas/.

usability. Private truck stops are staffed continuously to support safety and operations, including notifying law enforcement in the event of an emergency.

All of these respective costs and impediments require targeted solutions. Permitting can be streamlined, zoning and land-access processes can be updated to reflect the importance of providing truck drivers safe places to park, and targeted incentives (such as grants or tax credits) can help mitigate capital expenditures to make the investments more compelling.

V. DIVERGENCE BETWEEN DRIVER AND FLEET PRIORITIES

A core, foundational cause of truck parking challenges in the United States is the persistent misalignment between how drivers prioritize truck parking *versus* how motor carriers (*i.e.*, the companies that employ drivers) prioritize truck parking. Drivers consistently identify truck parking as one of their most pressing day-to-day concerns.[9] Drivers are expected to comply with strict delivery windows and HOS rules, yet they are often left to independently locate parking without guaranteed availability and, in most cases, without reimbursement if parking carries a fee.

Motor carriers, by contrast, tend to prioritize more macro business pressures such as freight rates, insurance costs, litigation exposure, and overall economic conditions.[10] While fleets certainly recognize that parking is an issue, it seems to be viewed more as a driver-level challenge rather than a core operational cost center. Although fleets advocate for public investment in parking infrastructure, parking is not integrated into routing decisions, pricing structures, or contract negotiations with shippers or truck stops in a systemic way. Instead, these decisions are driven by delivery efficiencies and minimizing fuel expenditures. The optimization of routes and schedules without fully accounting for parking constraints near pickup and delivery locations continues to drive truck parking disruptions. This is particularly problematic in dense metropolitan areas where parking is hardest to find.

This divergence in perspective helps explain why, despite clear demand from drivers, the market does not consistently, systemically generate the investment signals needed to expand parking capacity.

Drivers generally demonstrate a strong reluctance to pay out-of-pocket for parking, particularly for routine overnight stays that are required by federal HOS rules. In practice, this means that even when paid, reserved parking options are available, utilization is often limited and uneven and generates blowback from customers. Many drivers prefer to search for free parking rather than incur personal, non-reimbursable expenses.

As a result, the dominant industry practice today is that truck parking is provided at no direct charge to drivers. Parking is treated as an amenity that supports customer draw and dwell time, rather than as a standalone revenue stream. The vast majority of truck stops and travel centers do not charge a fee for parking. Their business model is built around the expectation that drivers will generate revenue through fuel purchases and in-store spending on food, beverages, and other items and services.

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[9] American Transportation Research Institute, "Critical Issues in the Trucking Industry–2024" (October 2024), *available at*: https://truckingresearch.org/2024/10/criticalissue-in-the-trucking-industry-2024/.
[10] *Id.*

Until trucking companies—and governmental agencies—start to consider parking as a planned expense within the freight system, this cycle of largely free parking combined with driver resistance to payment and pressure on taxpayers to subsidize expansion efforts will likely continue.

The result is inefficiency across the system, including wasted driving time, increased congestion from trucks searching for parking, reduced productivity, and increased demand on finite taxpayer resources to remediate the market failure.

FMCSA's efforts should not only seek to increase supply of parking, but also to better align incentives within the trucking industry. Encouraging fleets to treat parking as a standard, reimbursable operating expense (similar to fuel or tolls) would send clearer market signals and enable private operators to respond with targeted investments in capacity. Other transportation sectors provide examples of how lodging or rest-related costs can be incorporated into operational planning. (Airlines, for example, negotiate agreements with hotel chains to ensure rooms are available for pilots and flight attendants.[11]) Likewise, incorporating parking considerations into freight contracts and scheduling practices would improve trip planning and reduce uncertainty for drivers. Without such alignment, even the most well-intentioned public investments will fall short of fully addressing the underlying dynamics that drive parking shortages where they exist.

VI. TRUCKSTOP PROFITABILITY IS CRITICAL TO EXPANDING PARKING CAPACITY

A. Non-Parking Profit Centers Subsidize Parking Investments

The ability of truck stops and travel centers to expand parking capacity is directly tied to their overall financial health. Truck parking, in and of itself, rarely generates sufficient revenue to justify the significant costs associated with land acquisition, construction, zoning and permitting approval, and long-term maintenance. Instead, parking is part of a broader business model in which operators rely on fuel sales, food service, retail purchases, shower facilities, maintenance services, and other profit centers to generate the revenue necessary to support parking investments. Decisions to add or expand parking are not made in isolation – they depend on whether the overall location can sustain a return on investment.

A key component of this business model is the customer traffic ratio of heavy-duty commercial vehicles and light-duty passenger vehicles. Many travel centers serve substantially more customers from light-duty vehicles than trucks, yet dedicate most of their physical space to truck operations. The revenue generated from these light-duty customers plays a critical role in subsidizing truck parking infrastructure. As a result, even relatively small reductions in customer volume, for whatever reason, can have a disproportionate impact on a location's ability to justify new parking investment.

This dynamic is exacerbated in high-cost areas where parking challenges are most acute. In these markets, margins are already compressed by expensive land, regulatory compliance costs,

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[11] *See, e.g.*, Collective Bargaining Agreement between Southwest Airlines Co. and the Transport Workers Union of America, AFL-CIO, Local 556, art. 35, (Nov. 1, 2018 – Apr. 30, 2028), *available at:* https://media.twu556.org/2024/03/22074715/TA2024-Article-35-Hotels-and-Transportation-Annotated.3-20-24.pdf (mandating the airline to provide single rooms that are "safe, secure, convenient, and restful"); *see also* Collective Bargaining Agreement between American Airlines, Inc. and the Association of Professional Flight Attendants (APFA), § 6, (Oct. 1, 2024), *available at:* https://www.apfa.org/wp-content/uploads/2024/07/2024-CBA-SECTION-6-CREW-ACCOMMODATIONS.pdf (specifying that National Hotel Chair representatives must meet quarterly with the company to review hotel suitability and transportation).

and operational overhead. Truck stop operators must be confident that sufficient and sustained demand exists not just for parking, but for the full range of services offered at the location. If that confidence is undermined, operators are far less likely to commit capital to expanding parking capacity.

Not only does profitability justify investments, but *profitability enables reinvestment.* Truck stops that are financially successful routinely reinvest in their facilities. This includes upgrading infrastructure, improving amenities, and adding parking spaces. Locations that struggle, on the other hand, are forced to defer maintenance, scale back services, or abandon expansion plans. Over time, this can lead to stagnant parking supply and deterioration in the quality of existing facilities.

Efforts that strengthen truck stops' economic viability—by supporting customer traffic, reducing unnecessary regulatory burdens, and avoiding policies that diminish or divert revenue—will naturally lead to increased investment in parking capacity. Conversely, policies that weaken the underlying business model will constrain parking supply.

B. Commercializing Rest Areas Undermines Private Investment in Truck Parking

1) *Background on federal restrictions on commercial activities at Interstate rest areas*

When Congress created the Interstate Highway System in 1956, Congress and community leaders feared that local businesses, jobs, and tax bases would shrink as motorists and truck drivers bypassed their cities and towns. For this reason, Congress enacted 23 U.S.C. 111, which prohibits Interstate System rest areas from offering commercial services such as food and fuel.[12] Since then, businesses have clustered near the Interstates at the interchanges along the Interstate Highway System to provide services to interstate travelers.[13]

Today, there are more than 77,000 businesses located within a quarter-mile from the Interstate at exit interchanges, marketing directly to highway travelers.[14] These businesses employ more than two million people and contribute more than $20 billion annually in state *and* local taxes.[15]

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[12] A later clause provides that commercial existence within an Interstate System right-of-way before 1960 may continue to provide services under certain conditions. Pub. L. No. 95-599, sec. 114, 92 Stat. 2697.

[13] *See* 102 Congressional Record, Senate, May 29, 1956, at page 9207 (Senate adopting Senator Cotton's amendment prohibiting "automotive service stations or other commercial establishments for serving motor vehicle users to be constructed or located on the rights-of-way of the Interstate System. As the Senator explained: "The purpose of the [ban on rest area commercialization] was to prevent the granting of monopolies along with highways, particularly with respect to oil companies [*i.e.*, fuel retailers] and restaurants, to the exclusion of everyone else. … [I]f [such facilities] are not on the highway, they will be built on private property, and it is rather obvious that even though the State will control the ingress and egress, it will not be possible to grant monopolies."); *see also* Federal Highway Administration, "Interstate Frequently Asked Questions," *available at:* http://www.fhwa.dot.gov/interstate/faq.cfm#question31 (Noting that the intent of the rest area commercialization ban in 23 U.S.C. 111 "was to avoid State approved or supported monopolies for traveler services . . . . During the debate, Representative Charles A. Vanik (D-OH) explained what Congress had in mind: 'Let the highway traveler turn off the Interstate system if he requires food, motor-vehicle service, lodging or Stuckey's pecans.'")

[14] *See generally:* Patrick O'Brien et al., The Impact of Commercial Rest Areas on Business Activity at Interstate Highway Interchanges (Blacksburg, VA: Virginia Tech, 2011).

[15] *Id.*

Congress has repeatedly reaffirmed its original intent to protect off-highway businesses and localities from unfair competition on the Interstate right-of-way. Most recently, the Senate in 2012 resoundingly rejected an amendment to repeal the ban by a vote of 12-86.[16] Since then, Congress has not expressed a desire to roll back the longstanding prohibition on commercial rest areas.

2) *Commercialization of rest areas undermines private investment in truck parking*

Policies that introduce commercial services at Interstate rest areas risk directly undermining the private-sector business model that currently supports the vast majority of truck parking capacity in the United States. Truck stops and travel centers finance parking today through a cross-subsidy model in which revenues from fuel, food, retail, and other services help underwrite the high cost of acquiring land, navigating preliminary permitting processes, and maintaining large, paved facilities on an ongoing basis. When government-operated rest areas begin offering competing commercial services at sites in closer proximity to Interstate travelers, those efforts would have the effect of diverting a portion of this customer traffic away from private facilities, weakening the revenue base that make parking investments economically feasible.

This diversion, and the threat thereof, has a compounding effect: truck stop operators make capital investment decisions based on long-term expectations of customer demand and associated sales. Commercializing rest areas would reduce fuel, food, and retail traffic at nearby travel centers while directly lowering projected returns on investments in new locations. In high-cost markets where margins are already thin, even modest reductions in revenue can be enough to deter or delay expansion projects, including the addition of new parking spaces. This will, over time, result in substantially less private capital flowing into truck parking infrastructure, particularly in precisely those corridors where demand is highest.[17]

Commercialized rest areas also introduce structural uncertainty into the market for truck parking investments. Unlike private truck stops, which compete with one another based on price, quality of service and amenities, and overall customer experience, government-selected contractors at rest areas do not operate under the same profit-and-loss constraints. This can distort local market dynamics by shifting demand away from facilities that are incentivized to reinvest earnings into parking capacity and toward facilities that do not contribute to long-term expansion of supply. The net effect is not an increase in total parking capacity, but rather a redistribution of existing revenue away from the entities responsible for building most of that capacity.

The private sector's willingness to invest in truck parking is closely tied to its ability to generate revenue from a broad customer base, including passenger vehicles. If transportation policies reduce that broader traffic base, they weaken the financial ecosystem that supports truck parking development. This is particularly significant given that many truck stops rely on non-truck traffic to sustain the profitability required to justify large-scale parking investments.

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[16] Roll call vote *available at*: https://www.senate.gov/legislative/LIS/roll_call_votes/vote1122/vote_112_2_00045.htm.

[17] Ronald R. Knipling, "Rest Area Commercialization and Truck Parking Capacity: 2018 Update (December 2017)", prepared for NATSO, Inc., *available at* https://www.natso.com/wp-content/uploads/2026/05/Rest-Area-Commercialization-And-Truck-Parking-Capacity-2018-Update.pdf.

Commercializing rest areas would directly implicate the viability of private investment in truck parking. A more effective approach is to preserve the complementary relationship between public infrastructure and private investment, ensuring that policies do not inadvertently erode the revenue streams that fund the majority of truck parking capacity in the United States.

VII. RECOMMENDATIONS

To ensure FMCSA's information collection yields actionable and policy-relevant insights, NATSO respectfully recommends that the agency:

- Target analysis and investment toward high-need corridors and metropolitan regions where persistent truck parking challenges exist, rather than assuming a uniform national shortage;
- Incorporate private-sector cost data and operational realities into its analysis, including the capital, regulatory, and ongoing operational expenses associated with constructing and maintaining truck parking;
- Evaluate the role of fleet practices in shaping parking demand, including the extent to which motor carriers reimburse drivers for parking or incorporate parking into operational planning;
- Avoid policy approaches that undermine private-sector investment, including proposals that would divert customer traffic or revenue away from existing truck stops and travel centers;
- Encourage public-private partnerships that leverage the efficiency and expertise of private operators, particularly in high-cost or high-demand areas where targeted support can unlock new capacity.

A data-driven approach grounded in these principles will better position FMCSA and its partners to address truck parking challenges where they are most acute, while reinforcing the private-sector investments that currently provide the vast majority of parking nationwide.

VIII. CONCLUSION

NATSO appreciates the opportunity to file these comments, and looks forward to continuing to work with FMCSA and the broader Department of Transportation on these important issues. Please do not hesitate to contact us if we may be helpful in any way.

David H. Fialkov
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Government Affairs
NATSO, Representing America's Travel Centers and Truck Stops