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Date: 7/25/2025

Pipeline and Hazardous Materials Safety Administration  
Office of Pipeline Safety  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

## **Subject: Request for Additional Clarification in Interpretation 16-0166R**

To Whom It May Concern,

I am writing to respectfully request additional clarification regarding PHMSA Interpretation 16-0166R, specifically related to the reference of "whether the pickup truck in your scenario has a fifth wheel and would be considered a "truck-tractor," or has a traditional "ball and hitch." Trophy Trucking Services, LLC seeks clarification to address a recent violation and ensure compliance.

**Background and Context:** Our driver was operating a 2019 Chevrolet Silverado 3500 towing a trailer with a gooseneck, also known as neck-over, hitch configuration, secured in the truck bed. The hazardous materials were loaded solely on the trailer, and placards were affixed on both sides and the rear of the trailer, with the forward-facing placard

placed on the front bumper of the truck, consistent with our understanding of § 172.516(b). During an inspection, the driver received a violation because the forward-facing placard was not affixed to the front of the trailer itself. The reporting agency stated the 2019 Chevrolet Silverado 3500 does not qualify as a truck-tractor, and therefore, the trailer, as a separate transport vehicle, must independently bear a forward-facing placard.

**Relevant Details:** The trailer is secured just forward of the rear axle via a gooseneck hitch, rendering the truck bed unusable for carrying cargo. The hazardous materials are Division 1.4 explosives and are transported solely on the trailer. The trailer is not detached during transport nor delivery, and the operation occurs on public highways. The placards on the trailer's sides and rear meet the visibility and attachment requirements of § 172.516(a) and (c). Importantly, gooseneck hitches functionally eliminate the truck bed's cargo-carrying capacity, much like a fifth wheel hitch does. This physical constraint aligns with the criteria often used to differentiate truck-tractors from other vehicle types. While fifth wheel hitches can be installed in one-ton class pickup trucks, they are more commonly used to tow recreational vehicle (RV) trailers. In contrast, gooseneck hitches are the standard in both agricultural and commercial heavy-duty hauling, offering superior strength, durability, and performance in severe service applications.

The interpretation states "whether the pickup truck in your scenario has a fifth wheel and would be considered a "truck-tractor," or has a traditional "ball and hitch." We seek clarification on whether gooseneck hitch configurations are similarly considered indicative of a truck-tractor designation. These terms are interchangeable and describe a hitch type mounted in the truck bed, typically located just forward of the rear axle. Vehicles equipped with gooseneck hitches are frequently purchased and operated by commercial entities using one-ton class pickup trucks for the purpose of hauling significant cargo. These configurations are not incidental but are standard and customary in commercial cargo transport settings.

We would also like to note the phrase "traditional ball and hitch

connection” can be easily misinterpreted. In common usage, this phrase often refers to a rear-mounted ball hitch affixed to the bumper or frame, used for light-duty trailers. This type of configuration differs substantially from a gooseneck-style ball hitch, which is mounted in the bed of the truck and designed for commercial-grade towing. Clarifying this distinction within the interpretation would help prevent misunderstandings and ensure consistency in enforcement and compliance.

To aid in your review, I have attached photographs of a typical gooseneck (neck-over) hitch configuration. These images clearly show how the hitch occupies the truck bed space, rendering it unusable for general cargo and aligning functionally with the characteristics of a truck-tractor.

We respectfully request PHMSA’s interpretation as to whether this type of vehicle and hitch configuration is considered a “truck-tractor” under the regulatory guidance reflected in 16-0166R.

Thank you for your attention to this matter. Should you require additional details or wish to discuss further, please feel free to contact me directly at [mramirez@trophytrucking.com](mailto:mramirez@trophytrucking.com).

Sincerely,

Matt Ramirez  
West Texas Regional Safety Manager  
Trophy Trucking Services, LLC

Attachments:

- Photo Documentation: Gooseneck/Neck-over Hitch Configuration









