

Congress of the United States

Washington, DC 20515

April 27, 2026

Andrew Ferguson
Chair
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Mr. Ferguson:

We write to urge the Federal Trade Commission (FTC) to investigate and examine the effects of consolidation and private equity ownership in the fire apparatus and emergency vehicle manufacturing industry. We also urge the FTC to use its authority under Section 6(b) of the FTC Act¹ to investigate consolidation trends in that industry as well as other markets for essential emergency vehicles, parts, supplies, and services.

Private equity firm investment in the fire apparatus market over the past decade has led to dangerous consolidation. In 2006, private equity group American Industrial Partners (AIP) acquired and consolidated what was once 12 separate companies² and created the REV Group, which now controls a third of the U.S. fire truck sales market. Thanks to REV Group's consolidation of the market, three manufacturers now dominate more than two-thirds of the market, with Oshkosh controlling 25 percent of the market, and Rosenbauer controlling eight percent.³ As of 2023, REV Group estimated that independent companies make up only 20 percent of the market.⁴ Today, REV Group, Oshkosh, and Rosenbauer wield significant influence and power over the fire apparatus market—at the cost of public safety.

Industry consolidation has enabled private equity firms to sharply escalate the price of fire trucks, limit production capacity, impose restrictive contract terms, and significantly delay the delivery of essential firefighting vehicles and other emergency vehicles. We have heard from dozens of fire departments in California, Massachusetts, Kansas, and across the country about difficulties they have faced related to serial roll-ups of fire truck manufacturers, including delivery delays, defective parts, and price increases.⁵ These problems have reduced the readiness of fire departments to respond to emergencies, with dire consequences for public safety.

¹ (15 U.S.C. § 46(b); FTC, “A Brief Overview of the Federal Trade Commission’s Investigative, Law Enforcement, and Rulemaking Authority,” <https://www.ftc.gov/about-ftc/mission/enforcement-authority>

² Fuld & Company, “What a Competitive Strategy Analyst Thinks About the Fire Apparatus Industry,” <https://www.fuld.com/what-a-competitive-strategy-analyst-thinks-about-the-fire-apparatus-industry/>

³ Oliwier Samorajski, “Fire Truck Manufacturing in the US – Market Research Report, 2015-2030,” IBIS World, April 2025, <https://www.ibisworld.com/united-states/industry/fire-truck-manufacturing/5645/>.

⁴ REV Group, “2017 Annual Report,” Pg. 9, [rev-annual-report-2017.pdf](https://www.revgroup.com/annual-report-2017.pdf)

⁵ U.S. Senate Committee on Homeland Security & Governmental Affairs, Subcommittee on Disaster Management, District of Columbia, and Census. (2025, September 10). *Sounding the alarm: America’s fire apparatus crisis* [Hearing]. <https://www.hsgac.senate.gov/subcommittees/dmdcc/hearings/sounding-the-alarm-americas-fire-apparatus-crisis>

This industry consolidation among fire truck manufacturers coincides with dramatic increases in order backlogs and apparatus costs. Fire trucks that should have been retired after 15 or 20 years are now celebrating their 30th “birthdays” on the front lines.⁶ These older trucks break down more frequently and are more difficult to repair than new trucks, leaving gaps in communities’ fire protection systems and putting the public in danger. Some fire departments have reported that waiting times quadrupled from one year to over four years for some orders.⁷ According to a survey of 70 California fire chiefs, delivery times jumped from less than one year before the pandemic to over four years in 2025.⁸ According to the City of Fullerton, Pierce Manufacturing’s delivery time for identical fire engines has doubled, from two years in 2019 to four years for vehicles ordered in 2023.⁹ REV Group reported a record \$3.6 billion backlog in late 2023, a 41 percent increase over 2022.¹⁰ REV Group’s backlog increased again in 2024, to \$4.2 billion.¹¹

In addition to these dangerous delays, there has been a sharp increase in vehicle costs, which doubled between 2010 and 2020, beyond the level of inflation.¹² On September 10, 2025, Mr. Edward Kelly, the President of the International Association of Firefighters, appeared before the Senate Committee on Homeland Security and Governmental Affairs, Subcommittee on Disaster Management, where he testified that the significant price increase was due to consolidation among fire apparatus manufacturers.¹³ Fire Chiefs in Southern California faced price hikes when purchasing specialized trucks in particular: in 2019, a quint aerial truck cost about \$1.5 million. By 2024, the cost for a nearly identical truck rose to over \$2.2 million.

On top of already high base prices for new fire trucks, manufacturers have implemented “floating” prices, where they increase the final price of a fire truck after it goes into production. Because of production backlogs and purported difficulty projecting material costs over a two-to-three-year lead time, companies sometimes include clauses in contracts that allow them to change the price of an order long after it’s been ordered. For example, one fire department in Indiana purchased two fire engines, and, after waiting three years for delivery, was told it would cost an additional \$209,950.¹⁴ In another example, a fire department in Colorado was hit with a \$70,000 price increase.¹⁵

Instead of addressing this public safety concern and the manufacturing backlog, fire apparatus manufacturers have restricted supply or shut down their own manufacturing plants, worsening the fire truck shortage. Despite demand for fire trucks increasing in 2022, REV Group

⁶ On file with the Office of Congressman Derek T. Tran

⁷ Fire Apparatus & Emergency Equipment Magazine, “Fire Apparatus Delivery: Just Be Patient,” Ed Ballam, November 21, 2022, <https://www.fireapparatusmagazine.com/fire-apparatus/fire-apparatus-delivery-just-be-patient/>

⁸ Opinion: Lengthy fire equipment delays are putting lives at risk <https://www.westerncity.com/article/opinion-lengthy-fire-equipment-delays-are-putting-lives-risk>

⁹ On file with the Office of Congressman Derek T. Tran

¹⁰ Reuters, Fire Truck Boom Highlights Divide in US Manufacturing, U.S. NEWS (Jan. 19, 2024), <https://www.reuters.com/markets/us/fire-truck-boom-highlights-divide-us-manufacturing-2024-01-19/>

¹¹ [REV Group_10K - Proof#4](#)

¹² [Kelly-Testimony.pdf](#)

¹³ Sounding the Alarm: America’s Fire Apparatus Crisis Hearing Before the Subcomm. on Disaster Management, the District of Columbia and the Census of the S. Comm. on Homeland Security & Governmental Affairs, 119th Cong. (2025) (statement of Edward Kelly, witness)

¹⁴ *Id.*

¹⁵ Colorado State Fire Chiefs, “‘Floating’ Prices & Lengthy Delivery Times for Fire Apparatus,” (Aug. 25, 2022),

announced that it would close two custom fire truck manufacturing facilities it had purchased just a few years prior.¹⁶ This closure cut the company’s manufacturing footprint by roughly one-third and contributed to the nationwide backlog in fire truck delivery.¹⁷

Private equity profits and senior wages are at an all-time high, and it seems as though these backlogs are a deliberate business model. REV Group’s CEO, Mark Skonieczny stated in an earnings call on June 5, 2024, ““With strong backlogs that extend up to two and a half years, these businesses have the visibility and opportunity to drive significant shareholder value.”¹⁸ Instead of increasing manufacturing capacity to address the supply chain bottlenecks, REV Group has spent only about one percent on upgrading its building and equipment while allocating much more to repurchasing common shares.¹⁹

We urge you to investigate these practices and update your reporting requirements based on your findings. The FTC should use its 6(b) authority to examine whether these fire apparatus manufacturers use their market power to hamper the ability of customers to move to their competitors; or to impose contractual restrictions that impede competition, such as noncompete clauses that make it more difficult for workers to join—or start—rival companies, or clauses that limit customer choices for repairing their products.

In its study, the FTC should investigate topics such as:

- National and regional consolidation trends, such as the number, frequency, and magnitude of transactions, especially by the most dominant players
- National and regional market shares of the top firms in each industry
- Whether transactions have been followed by an increased rate of price hikes
- Whether transactions have been followed by reduction in production capacity (e.g. through plant closures) or longer delivery delays
- Whether regions that have been impacted by consolidation have experienced changes in public safety metrics, such as response times
- The sufficiency of the merger guidelines to address roll-ups acquisitions in the fire and emergency equipment markets.

Thank you for your consideration. We look forward to working together to improve the lives of hardworking Americans.

Sincerely,

¹⁶ KME plant to close in April 2022. <https://www.tnonline.com/20210911/kme-plant-to-close-in-april-2022/>

¹⁷ 2025.02.17 NYT: [As Wall Street Chases Profits, Fire Departments Have Paid the Price](#)

¹⁸ Yahoo Finance, “Q2 2024 REV Group Inc Earnings Call,” Thomson Reuters Street Events, June 6, 2024, REV Group, Inc. (NYSE:REVG) [Q2 2024 Earnings Call Transcript](#)

¹⁹ [REV Group, Inc. Reports Strong Fiscal 2025 Second Quarter Results; Updates 2025 Guidance – REV Group](#)



Derek T. Tran
Member of Congress



Robert Garcia
Member of Congress