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Representative Peter DeFazio
405 E 8th Ave., Suite 2030
Eugene 97401

February 16, 2011

Re: Urgent Appeal For Congressional Hearings on Federal Motor Carrier Safety Administration's Proposed Hours of Service Rule Changes

Dear Representative DeFazio:

Two weeks ago more than fifty representatives from the motor carrier industry met in Portland to review and comment on proposed hours of service rule changes announced by the Federal Motor Carrier Safety Administration ("FMCSA") the end of December. The FMCSA state Administrator had to excuse himself from the room during the discussions, explaining that the FMCSA's attorney's forbade the agency's representatives from participating in any way in discussions of the proposed rule changes. As you may or may not be aware, the rule change is the result of a settlement agreement against the FMCSA arising out of a lawsuit by several interest groups following rule changes that were made in 2003.

The consensus of those gathered in Portland January 27 was that the proposed rule changes would be a blow to the motor carrier industry – and by extension, to our state and national economies as well – and that the FMCSA is not being responsive to the input of the industry it regulates. It was agreed that unless Congress takes **immediate action** to hold hearings and fully investigate the impact of the rule changes, our country will experience sharp increases in the cost of virtually all our commodities by the end of this year as motor carriers are forced to pass on the increased cost of operations the rule changes will require.

Through this letter, I respectfully request that as our voice in Congress, you exert every influence at your disposal to see that Congress fully investigates this matter before it is too late. I will present here background information and informed opinion that will in the end, I believe, raise questions in your own mind that must be answered. I thank you in advance for giving this matter your attention.

Respectfully yours,

"Skip" Nash, Director of Operations - Standard & Best of Oregon LLC

Michael Hitchcock, Corporate Director Driver Development – Knight Transportation

Tom Swarts, Traffic Manager - Bi-Mart Corporation

Michael Meredith, Training and Development Manager – Haney Truck Line

Rocky Buckles, General Manager – Thomas & Sons, Inc.

Steven Taylor, Logistics Manager - Fred Meyer

Randy Perryman, Transportation Manager – Interstate Wood Products

Kathy Fruitt, Owner - Jim Fruitt Trucking

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Terry Leavitt, President – Leavitts Freight Services
Jana Corder, General Manager – Specialized Transport Services
Alan McNew, Transportation Manager – Oregon Food Bank
Dennese Murray, Safety & HR – The Jerry Brown Company
Bob Howard, General Manager – System Services of America, Gresham
Lisa Lathrop, Owner – Alpine Transportation, Inc.
Dave Gray, President – GloStone Trucking Solutions
John Anderson, Partner – Anderson & Yamada, Attorneys at Law
Larry Anderson, Attorney at Law
Steve Caldwell, Oregon Operations Manager – Bettendorf Trucking
Jim McKinney, Director of Education – ITR Truck Schools
Bill Lundin, Safety & Risk Manager – Independent Dispatch, Inc.
Mike Knight, Director of Safety – Blue Line Transportation, Cascade Petroleum
Kevin Dunn, Director of Safety – Mitchell Brothers Truck Line, Inc.
Stephen L. Day, President – American Fast Freight, Inc.
Herb Bickle, President – HBE, Inc.
Richard Fazio, President – Fazio Brothers Sand Company

Enc. Federal Register Vol. 75, No. 249, Proposed Rules
Oregon 10-year Crash Statistics
Arguments for immediate hearings and review of proposed hours of service rules

Standard & Best of Oregon LLC

690 NW 1st Ave, Suite 109
Canby, OR 97013

Request for Congressional Hearings on Proposed Hours of Service Rule Changes

The Department of Transportation, Federal Motor Carrier Safety Administration's proposed rules fail to satisfy that Agency's objectives and ignore relevant crash safety data.

Request for Congressional Hearings on Proposed Hours of Service Rule Changes

Proposed rules fail to satisfy the DOT's objectives and ignore relevant industry economic and safety data.

Why you are receiving this request

About two years ago the Federal Motor Carrier Administration ("FMCSA") was sued by several interest groups, challenging the FMCSA's hours of service rules.¹ This was only one of a continuing barrage by various groups to reshape the FMCSA's rules.

In October 2009, the DOT, FMCSA, and the HOS petitioners reached a settlement agreement, which required a new rulemaking and final rule by July 26, 2011. The FMCSA held several listening sessions to obtain input from the industry and published an announcement of proposed rulemaking ("ANPRM") in the Federal Register December 29, 2010.²

While the motor carrier industry and allied stakeholders were consistent and by all reasonable standards, unified in their input, the FMCSA's ANPRM for all intents and purposes ignored that input. A 60-day comment period followed the ANPRM. To further compound industry frustration, when motor carriers and other interested parties approached the FMCSA to explain the proposed rules and answer questions, they were told that the FMCSA was prohibited from answering questions or even making basic presentations, explaining what was to all concerned a very confusing set of rules.

There are at least three reasons why Congress should investigate.

- The proposed rules contradict the FMCSA's stated objectives during early phases of the rulemaking, and fail to satisfy many of the FMCSA's stated objectives.
- The proposed rules ignore available crash data.
- The proposed rules will impose an economic hardship on an industry and nation that is struggling fiscally.

For these reasons, and probably many more, Standard & Best of Oregon and those who have added their names as signors to this letter, respectively and with hope for your favorable response, request that you

¹ "Hours of service" (aka 'HOS') refers to how many hours a regulated commercial driver can drive.

² FR 75, No. 245. See attached copy of proposed rule.

exert every influence at your disposal to convene hearings into the merit and methods of the proposed hours of service rules.

Why is Standard & Best making this request?

Standard & Best of Oregon LLC is a motor carrier regulatory compliance consulting firm serving clients in 28 states and 2 Canadian provinces. A list of its clients include many of the household names in Oregon and Washington: Kroger Distribution, Golden State Foods, Food Services of America, Winco Foods, Darigold, Oroweat, Knight Transportation and many more. Our involvement with motor carriers provides the advantage of understanding what keeps goods and services moving safely and what does not.

During Standard & Best's 2011 Annual Safety Issues Update held at the Monarch Hotel in Clackamas last month, more than 50 representatives from Oregon and Washington motor carriers were present to provide comments and try to understand what the proposed rules will mean to their businesses. They were frustrated. While it is safe to say that probably all industries resist new rules that require significant changes, it is also fair to say that in this case at least, they are justified.

It was suggested at that meeting that the only real hope for bringing some common sense to the present rule making situation would be to bring it under the spotlight of congressional review. Standard & Best is therefore taking the initiative to do so.

This report will not attempt to repeat everything that has already been said in the docket³, but will instead endeavor to focus on the three stated reasons why Congress should investigate. It is fair to say that if one were to take even a casual review of the more-than-7000 comments now in the docket, they would find a general assortment of 'cookie cutter' replies that do very little to promote serious consideration. The sameness of these many comments, however, should not demean the seriousness of the present situation.

By all estimates, if the proposed rules are implemented as proposed, the cost of goods sold will increase. And in some cases, increase dramatically. Many small business will instantly become uncompetitive. And not a few of them will go out of business, placing an even greater strain on our state's frustrated economy. Please read the enclosed material thoughtfully and with a sense of urgency. Anything less will be costly to all Oregonians and our nation at large.

³ Docket No. FMCSA-2004-19608

The proposed rules contradict the FMCSA's stated objectives during early phases of the rulemaking, and fail to satisfy many of the FMCSA's stated objectives.

When the FMCSA announced that there would be listening sessions to obtain industry input for the proposed rulemaking, it asked for comment on specific areas of driver's hours of service.⁴ The Administration added that:

"The scenarios are merely set forth for discussion. The FMCSA will not necessarily include them in a Notice of Proposed Rulemaking."

In the face of overwhelming testimony to the contrary, the FMCSA has proposed precisely what it said was "merely set forth for discussion." The Administration asked commenters to address:

1. Whether mandatory breaks would improve safety and should they be included
2. How many hours per day/week would be safe and healthy for a driver to work
3. Should drivers who drive at night time drive less
4. Is a 34-hr restart sufficient for restorative rest
5. Do drivers who drive at night have special considerations
6. How do drivers currently use the 34-hr restart
7. Should the sleeper berth provisions be revised
8. How do delays while loading/unloading affect driver productivity
9. Have shippers/receivers revised their practices to reduce delays
10. Are there aspects of the current rule that do not increase safety risks or adversely impact driver health and that should be preserved

Commenters were very clear in their testimony – Current rules work well and accidents have been significantly reduced. There is no evidence that any major changes are needed.⁵

The proposed rules would change virtually every area that the industry was asked to comment on. They would:

⁴ See attached announcement.

⁵ See "Hours of Service Special Briefing"

1. Include mandatory off-duty time "breaks" in order for a driver to continuing driving
2. Revise the number of hours per day/week a driver can work/drive
3. Reduce available working hours for drivers who drive during split shifts or evening routes
4. Extend the number of hours to obtain a restart
5. Limit the frequency of a restart
6. Leave the sleeper berth provisions unchanged
7. Reduce the available hours to work
8. Change aspects of the current rules that have contributed to a reduction in CMV crashes over the past 5 years

I submit that in so doing the FMCSA was disingenuous and contradicted its stated objective for the listening session.

In addition, the proposed rules are not needed to support the Administration's stated core values.

In a 2010 statement FMCSA Administrator Anne Ferro outlined the Agency's "core" values –

1. Raise the bar to entry to the motor [carrier] industry;
2. Maintain high [safety] standards to stay in the industry; and
3. Remove high- risk operators from our roads and highways.

"Those three core priorities really frame what we are doing," said Administrator Ferro⁶. If these are the Administration's "core values," then the proposed rule isn't needed.

The proposed rule in no way changes what it takes to enter the motor carrier industry. Motor carriers will still be able to obtain an operating authority, pass the New Entrant Safety Audit, and operate unimpeded until something in their safety performance singles them out.

The proposed rule in no way raises the standard to stay in the industry. While it is true that the proposed rule provides for increased fines for "egregious violators" of the new rules, the proposed rules only make it more difficult to operate profitably and will more than likely increase the rate of violation.

⁶ Fleet Owner Magazine, January 20,2010

The proposed rule in no way adds to the Administration's effectiveness at removing high-risk operators. Under the Administration's newly implemented CSA safety initiative, high-risk operators are easily identified and impacted by interventions.

Besides the above obvious examples, the proposed rule is replete with admissions that the means and methods used to arrive at the new rules are incomplete, if not altogether contradictory.

Consider the following. In the Overview under the "Goals" heading,

The proposed rule also would provide drivers with the flexibility to obtain rest when they need it and to adjust their schedules to account for unanticipated delays. FMCSA has also attempted to make the proposed rule easy to understand and readily enforceable.⁷

The proposed rules **reduce flexibility** to obtain rest, **add delays** to the driver's day, are **complicated** to understand, and **difficult to enforce**.⁸

Also in the Overview, the FMCSA admits that even though accidents have declined since the rules were revised in 2003, "the source of the decline in crashes is unclear." In the case of Oregon's safety performance, the source of decline is quite clear and available data makes it possible to compare crash data against proposed rules.

Nearing the conclusion of the Overview, the Agency believes that:

Because the drivers who work very extensive hours are a relatively small minority, FMCSA does not anticipate that this rule would have significant adverse impact on the industry.⁹

If those who work "very extensive hours are a relatively small minority," one must ask why the rules that have worked so well for the rest of the industry must be changed.

The number of inconsistencies contained in the proposed rule are numerous. It is not the intent of this document to recite them all; rather, it is hoped that you will work as a force for action to see that Congress gets straight answers and not convoluted solutions. While there is no immediate evidence to support the claim, it is suspected by some that the real reason for many of the proposed changes is to favor one segment of our economy at a cost to another. If that is true, then it is wrong and will only impose a heavy cost to our country as a whole.

⁷ FR 75, No.249, p.82171

⁸ See Oregon Department of Transportation's comments to Docket.

⁹ FR 75, No.249, p.82172

The proposed rules ignore available crash data.

In its comments to the docket, the Oregon Department of Transportation, Motor Carrier Transportation Division points out that "Oregon collects more useful data on truck at fault crashes than any other state ... and has one of the lowest large truck crash fatality rates anywhere."¹⁰

It is not my purpose to repeat what can easily be deduced from ODOT Administrator Gregg Dal Ponte's comments to the docket. It is helpful, though, to point out noteworthy insights from the data Mr. Dal Ponte refers to.¹¹

Oregon's crash data collection is unique, obtaining hours driving and hours on-duty data at the time of the crash for each reportable crash. Analysis of data for the past 10 years suggests key changes in the **proposed HOS rule** are unlikely to address critical driving safety variables in truck at fault crashes:

- **75.7% of crashes occur between 6AM-6PM** - Challenging the benefit of forcing drivers who normally do their driving during night time hours to now drive during the hours where the greatest number of crashes occur. (34-hr restart provision would require 2 periods midnight - 6AM off-duty)
- **12% of crashes occur midnight-6AM** - A significantly lower number than daytime crashes.
- **7.3% of crashes occur 8PM-midnight** - The latest a driver can go off-duty and still complete a 34-hr restart that includes 2 periods midnight - 6AM off-duty. Drivers who miss this 'window' will forfeit a less-crash-intensive driving opportunity.
- **21.1% of crashes occur within the 1st hour of driving & 12.5% occur within the 2nd hour** - Challenging the causal relationship between mandatory breaks by the 7th hour to promote safety.
- **3.25% of crashes occur after 10 hours driving & 1.03% after 11 hours driving** - Challenging the basis for limiting driving time to 10 hours.
- **In 2009 only 1 crash occurred after the 70th hour on-duty** - Arguing strongly for the effectiveness of the current 34-hr restart rule.

Oregon crashes were reduced by 25.55% 2008-2009 under present rules while applying other strategies - challenging the basis for any changes.

¹⁰ See ODOT's comments.

¹¹ See Oregon Ten Year Crash Statistics

The proposed rules will impose an economic hardship on an industry and nation that is struggling fiscally.

It would be imprudent of any lawmaker to alter his or her position just because a large group of voices said they should do so. The voice of the masses is not necessarily the voice of reason. The fact that more than 7,000 comments to the docket echo the cry that the proposed rules 'will wreck our economy and put small companies out of business' should be a concern, but is not in and of its self actionable. Facts are needed.

I have met personally with many motor carriers – some of them being large, regional carriers, and some being smaller entities – and after reviewing their present operations in light of the proposed rules, I can state emphatically that our Oregon and national economy will suffer a noticeable negative impact with these rules.

In the case of one Oregon-based company with operations in several western states and 75 drivers, 26% of their current Oregon routes will have to be revised.

In the case of a 7-driver industrial chemicals transporter, 90% of their routes will become unprofitable, which will likely exclude this carrier from the market, even possibly forcing them out of business.

In the case of regional truck driving school, a lead manager points out that even in our present economy is very difficult to attract new drivers to consider a career in commercial driving, and that the proposed rules only exasperate the situation.

In the case of the 350,000 independent owner-operators who form the backbone of many large fleets, one service provider familiar with the industry observed that even now "(U)sing the best case cost scenarios, an Owner Operator will take home to his family \$24,400 to \$53,440 per year, less federal and state income taxes." Any reduction in earning capacity would have obvious detrimental effects.

These are but the tip of the 'tip of the iceberg.' No reasonable person can ignore the fact that when you reduce the operating resources (driver's hours) and increase the cost of goods sold (added drivers, equipment and operating costs), you must pass on those increases to the customer, who will in turn pass on the costs to the consumer.

Conclusion and summary remarks.

In conclusion, may I say thank you for taking this request seriously, which I must assume that you have if you have read this far. As stated earlier, it is not unusual for an industry to resist major changes. But from my vantage point, there is good reason for them to do so in this case.

Please speak about this with your peers from other states. Please reflect upon those signatories included with this request. They do not by any means represent the total number of concerned companies – only the number who could be contacted on very short notice. I believe that if you were to hold meetings in your home district you would find the numbers to be significantly greater.

Respectfully yours,

Gary "Skip" Nash
Standard & Best of Oregon LLC
Director of Operations
SN/jm

Stakeholders joining in the request for Congressional Hearings

Michael Hitchcock, Corporate Director Driver Development – Knight Transportation
Tom Swarts, Traffic Manager - Bi-Mart Corporation
Michael Meredith, Training and Development Manager – Haney Truck Line
Rocky Buckles, General Manager – Thomas & Sons, Inc.
Steven Taylor, Logistics Manager - Fred Meyer
Randy Perryman, Transportation Manager – Interstate Wood Products
Kathy Fruitt, Owner - Jim Fruitt Trucking
Terry Leavitt, President – Leavitts Freight Services
Jana Corder, General Manager – Specialized Transport Services
Alan McNew, Transportation Manager – Oregon Food Bank
Dennese Murray, Safety & HR – The Jerry Brown Company
Bob Howard, General Manager – System Services of America, Gresham
Lisa Lathrop, Owner – Alpine Transportation, Inc.
Dave Gray, President – GloStone Trucking Solutions
John Anderson, Partner – Anderson & Yamada, Attorneys at Law
Larry Anderson, Attorney at Law
Steve Caldwell, Oregon Operations Manager – Bettendorf Trucking
Jim McKinney, Director of Education – IITR Truck Schools
Bill Lundin, Safety & Risk Manager – Independent Dispatch, Inc.
Mike Knight, Director of Safety – Blue Line Transportation, Cascade Petroleum
Kevin Dunn, Director of Safety – Mitchell Brothers Truck Line, Inc.
Stephen L. Day, President – American Fast Freight, Inc.
Herb Bickle, President – HBE, Inc.
Richard Fazio, President – Fazio Brothers Sand Company

Attachments

Federal Register Vol. 75, No. 249, Proposed Rules (Annotated)

Federal Register Vol. 75, No. 2, Notice of Public Listening Sessions (Annotated)

Hours of Service Special Briefing

Oregon Department of Transportation Comments to the Docket

GloStone Trucking Solutions Comments

Blue Line Transportation Comments

Oregon 2009 Crash Statistics¹²

¹² Oregon 10-year crash data is available upon request. It was not included in this document in the interests of space.

CERTIFICATE OF SERVICE

This is to certify that on this day of February 16, 2011, the undersigned mailed or delivered, as specified, the designated number of copies of the foregoing document to the persons listed below.

Senator Ron Wyden 911 NE 11th Ave Suite 630 Portland, OR 97232	Hand Delivered
Senator Jeff Merkley 121 SW Salmon St # 1400 Portland, OR 97204-2948	Hand Delivered
Representative Peter DeFazio 405 E 8th Ave., Suite 2030 Eugene 97401	Mail and Email
Representative Kurt Schrader 621 High St., Oregon City 97045	Hand Delivered
Representative Earl Blumenauer 729 NE Oregon, Suite 115, Portland 97232	Hand Delivered
Representative Greg Walden Jamison Bldg 1051 NW Bond St., Suite 400 Bend 97701	Mail and Email
Representative David Wu 620 SW Main St., Suite 606 Portland 97205;	Hand Delivered



Oregon

John A. Kitzhaber, MD, Governor

DEPARTMENT OF
TRANSPORTATION
DOCKET OPERATIONS

Department of Transportation
Motor Carrier Transportation Division
550 Capitol Street NE
Salem, OR 97301-2530
www.oregon.gov/ODOT/MCT/

2011 FEB -3 A 11: 27

January 20, 2011

Ms. Anne Ferro
Administrator
Federal Motor Carrier Safety Administration
Attn: Hours of Service of Drivers
Docket # FMCSA-2004-19608
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Dear Administrator Ferro,

I am writing to submit comments pertaining to the proposed changes to the driver hours of service regulations. In doing so, I take note of the fact that various opponents of the proposed changes have erected websites offering pro forma arguments against the proposed rules offered from the perspective of motor carriers, drivers and shippers and have encouraged all of the former to submit duplicative similar expressions reproduced from the website. I am thinking quality of submission may weigh more heavily in your examination of docket content than will quantity of repeated thought duplicated from websites. What may be lacking is the perspective of a state regulator charged with the responsibility of enforcing federal motor carrier safety regulations and reducing truck and fault accidents and attendant death and injury. I write to you on this occasion offering original thoughts from the perspective of a regulatory official.

First I'd like to devote a few paragraphs to establish my credentials to offer comments. Oregon truck safety inspectors are currently showing their national peers the way to effectively find problem truck drivers. According to Federal Motor Carrier Safety Administration records, Oregon ranks first in the country in the percentage rate that its inspectors find drivers with critical safety violations. In Fiscal Year 2010, the FMCSA lists Oregon with 42,941 inspections and a 15% rate for placing drivers out-of-service. Only Connecticut, with 21,023 inspections and a 13% rate, comes close to Oregon. Overall, nationally, inspectors put drivers out-of-service at a 5% rate.

For several years now Oregon inspectors have been making headlines in special multi-day inspection exercises. In eight major exercises in 2010 that extended over 40 days, inspectors checked 4,804 drivers and placed 1,278 out-of-service for critical safety violations (27%). Most of the violations were related to driving after the 14th hour after coming on duty, driving more than 11 hours, and holding logbooks that were not current, improperly completed, and/or falsified. The results in 2010 look very similar to results from previous years. In six special exercises in 2009, inspectors checked 4,076 drivers and placed 1,152 out-of-service for critical safety violations (28%), again mostly for logbook and hours-of-service violations. In six exercises in 2008, inspectors checked 4,893 drivers and placed 25% out-of-service. In four exercises in 2007, inspectors checked 4,544 drivers and placed 25% out-of-service.



Oregon Motor Carrier Crash Report Comparison - 2008 Vs 2009

	<u>YEAR</u>	<u>2008</u>	<u>2009</u>	<u>PCT/CHANGE</u>
Total Crashes		1,260	915	-27.38%
Injuries		502	350	-30.28%
Deaths		34	29	-14.71%
Truck At-Fault - Driver		634	472	-25.55%
Truck At-Fault - Mechanical		35	30	-14.29%
Other Driver At-Fault		535	360	-32.71%
Non Driver At-Fault*		56	53	-5.36%
Hazardous Material Crashes		42	12	-71.43%
Hazardous Material Spill/Release		7	1	-85.71%
Other Load Spills		69	37	-46.38%
Oregon-Based Carriers		676	474	-29.88%
Foreign-Based Carriers		584	441	-24.49%
Collisions		949	691	-27.19%
Single-Vehicle Crashes		311	224	-27.97%
Number of Fatality Crashes		32	26	-18.75%
Fatality-Truck At-Fault-Driver		10	7	-30.00%
Fatality-Truck At-Fault-Mechanical		0	2	#N/A
Fatality-Other Driver At-Fault		19	14	-26.32%
Fatality-Non Driver At-Fault*		3	3	0.00%

In 2009, crashes involving trucks were down 27 percent and truck-at-fault crashes were down 25 percent. The crashes resulted in 30 percent fewer injuries and 15 percent fewer deaths. Historically, Oregon's truck crash rate is much lower than national rates. Oregon is the only state that analyzes incidents to determine which vehicle was to blame, so it focuses on truck-at-fault crash rates. Most truck-at-fault crashes are caused by drivers speeding, tailgating, or changing lanes unsafely. Crashes are also affected by traffic congestion, weather, and law enforcement presence to deter traffic violations. Oregon's trucking industry is equally committed to highway safety and strongly supports the MCTD program.

That introduction brings me to my first point. It is unimaginable to me that a public state agency that will be required to retrain regulatory enforcement staff, educate motor carriers and drivers, and in general direct the day-to-day business of enforcing a revised new hours of service rule would not have an opinion worthy of receiving your careful consideration. In your description of the proposed rules it is stated that FMCSA believes the developed rules are, "Easy to understand and readily enforceable." In my opinion, you are understating the size of the effort required to un-educate and re-educate over

Ms. Anne Ferro
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500 certified safety inspectors in Oregon and who knows how many nationwide. I also do not think you have given sufficient consideration to the level of review that will be required roadside to evaluate all of the new subtleties introduced by the new rule. As an example, consider the changes to the restart provision. The 34-hour restart allowing drivers to restart their 60- or 70-hour on-duty clock by taking at least 34 consecutive hours off-duty, would have three limitations. First, any restart must include two periods between Midnight and 6 a.m. Second, a driver would be allowed to begin another 34-hour off-duty period no sooner than 168 hours (7 days) after the beginning of the previous restart. Third, the driver would have to designate whether a period of 34 hours or more off-duty was to be considered a restart.

If it were the case that FMCSA had satisfactorily demonstrated with empirical data that there were measurable gains to be realized by making these changes in terms of safety outcomes, I'd be more willing to invest the effort to retrain. Instead, I'm looking at nationwide gains in truck and driver safety and wondering why we are "fixing" the current rules that certainly seem to be working well. I'm just not certain what benefit will be realized by putting everybody concerned through this exercise. After all, in your own description of the proposed rules FMCSA states that the "Source of the decline in crashes (since 2003) is unclear." If that is the case, it is difficult indeed to accept that a random revision in the rule will bring about further improvement and it goes without saying that the proposed changes to the restart provision will contribute to a loss of efficiency in motor carrier operations. The bottom line here is that drivers will have difficulty understanding and complying with the changes and law enforcement personnel will have difficulty consistently enforcing them.

Secondly, I'd like to comment on the FMCSA admission that it "Needs additional data to estimate relative crash risk in each hour of driving," and that "The percentage of CMV crashes associated with fatigue is not known." Oregon collects more useful data on truck at fault crashes than any other state that I know of, and Oregon also has one of the lowest large truck crash fatality rates anywhere. The data that we possess can document how many on-duty hours preceded a particular crash. Broadly looking at that database it occurs to me that most truck at fault crashes occurred in the first hour of driving making it curious that anyone would quibble over whether or not driving time between two rest periods should be set at either 10 or 11 hours. FMCSA says it prefers a 10-hour limit, but it's still considering both a 10- and 11-hour driving limit.

Finally, I'll not restate in these comments the various points that have been repeated over and over in driver and motor carrier comments submitted to this docket. However, I will observe that apparently **neither** trucking industry representatives **nor** the coalition of groups that have successfully

Ms. Anne Ferro
Page 4
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challenged earlier versions of the rule twice in federal court are satisfied with the direction and content of the proposed rule. That fact contrasted against the reality that the current hours of service rules have been functioning well and safely since they were made effective in 2004 seems to argue that it is ill-considered and inappropriate to propose such complex changes to the current hours of service rules .

Thank you for considering my comments.

Respectfully,

A handwritten signature in black ink that reads "Gregg Dal Ponte". The signature is written in a cursive style with a large, prominent initial "G".

Gregg Dal Ponte, Administrator
Motor Carrier Transportation Division
Oregon Department of Transportation
550 Capitol Street NE
Salem, Oregon 97301-2530

Ms. Anne Ferro, Administrator
Federal Motor Carrier Safety Administration
Docket # FMCSA-2004-19608
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

January 24, 2011

Dear Ms. Ferro,

My name is David Gray. I own and operate Glostone Trucking Solutions in Portland, Oregon. My company serves the trucking industry by providing expertise, reporting and record keeping support that help Carriers comply with the many FMCSA, IRP, IFTA, IRS, State, County and City regulations. My company provides services for and has influence over 1,500 trucks on the road today, many of which are Owner Operators.

Most of the comments regarding the HOS proposal will be centered around the lack of science surrounding the proposed changes, that the new rules will force more equipment onto the roads, and that the nation's distribution network will be disrupted, all of which I believe to be valid. What I wish to call your attention to is how the new HOS proposal will affect the 350,000 Owner Operators in this country.

To understand the affect that this new proposal will have on the Owner Operator, all you need do is look at the numbers. The following statistics were compiled by the Owner-Operator Independent Drivers Association Foundation based upon member profiles and reported in the July 2010 issue of Land Line magazine:

An Owner Operator will drive 110,000 miles per year. 80% or 88,000 of those miles will be paid miles and the balance unpaid, deadhead miles.

An Owner Operators cost to operate his truck, including truck payments, insurance, a maintenance reserve, tires, taxes, permits etc., will be just under \$112,000 per year. This \$112k cost is a best case scenario and was based upon fuel at \$3.00 per gallon and no major repairs being required during the year. We already know \$3.00 per gallon fuel is a thing of the past.

Take these numbers and compare them against the average rates per mile Owner Operators are currently getting paid for the loads they haul. Fair Tran LLC reports that long haul rates on January 18, 2010 were \$1.55 to \$1.88 per mile depending upon the equipment being used. Multiply these figures by the 88,000 paid miles driven, you now have the Owner Operators annual gross revenue, \$136,400 to \$165,440 per year. Using the best case cost scenario, an Owner Operator will take home to his family \$24,400 to \$53,440 per year, less federal and state income taxes.

The Owner Operator has no margin for error using today's HOS requirements. The proposed HOS requirements take away 10% or more of the available time Owner Operators have to drive paid miles. The result will be Owner Operators forcing more miles into each driving hour trying to maintain their paid mile income or face reduced revenue to the point of being beyond the ability to stay in business. This HOS proposal is a business killer to the very income class of people needing the most help.

Please don't let the politics of this new rule proposal destroy the livelihood of over 350,000 American businesses.

Thank you,
David Gray, President
Glostone Trucking Solutions
9111 SE St Helens St.
Clackamas, Oregon 97015
503-607-1088

Pelletrox, Inc.

Blue Line Transportation □ Portland Motor Transport

Cascade Petroleum Transportation/Petroleum Cargo Carriers

2606 N. Newark St. Portland, OR 97217 □ 1-800-513-9669 □ Fax:503-279-2637

Comments in regards to the new HOS proposal,

My company has been in business since 1963, starting out with Pelletrox Inc, Portland Motor Transport, Blue Line Transportation, Cascade Petroleum Transportation, Petroleum Cargo Carriers some of our companies operate seasonally and some year around, we run 24/7 with drivers out at all hours, our company started with one truck and has grown to a company that operates 65 truck with pull trailers and up to 100 trailers we employed 42 drivers year around and at our seasonal peak will reach 65 to 70, we have 10 mechanics, 14 office to which I am the safety director, I was given the opportunity in 1993 after being employed as a driver for this company since 1974.

My drivers have no desire for this impending change or doom, their truck drivers they don't write letters what they do well is deliver our loads safely, we have won numerous awards for our safety we pride ourselves that we maintain a group of drivers that are committed to their work and safety. Their professionals at what they do. It has taken them this long to adjust to the change of 2004, to where they do like the system; they like the restart, feeling that it gives them adequate time to rest and to be home with their families. For a lot of our runs, the 11 hours of driving give them the opportunity to make a run and be home at night, instead of in a motel room or a sleeper berth. They rest better, they eat better, and they are able to take a well balanced meal with them on their next assigned run, instead of eating in restaurants or from a convenience store.

The majority of my drivers load out of refineries, where on a daily bases have to sit and wait for their turn to load. Their sitting time can range from ½ hour to 4 hours. When they have an extended wait time, they will get out of their truck and walk around it, they have learned through company training that by walking around their truck 80 feet long 66 times they just walked a mile, they have been provided a health plan, that gives advice on heart disease, diabetics, hearing, meal planning and stretching diagrams, we strongly encourage them to utilize it to which most do. We have had driver meetings that health professionals come and speak on Hypertension, Sleep deprivation, Diabetes, Body Mass, Meal planning and Exercise programs.

My seasonal employee's service the construction Industry, either my delivering to hot asphalt plants, or to various state government maintenance sites where major road repairs are being administered. Some days my drivers will set from two hours to eight hours waiting to be off loaded, the delay comes from all the mechanical malfunctions that can occur when you are operating large machinery, in the current hos, a driver on most occasions is able to make it home. Under this new plan, a layover will almost certainly occur.

The ending of the 14 hours on duty not driving will have a major impact on not only my drivers and company but to the state maintenance sites we service. They are under no Hours of Service Jurisdiction and continue working after the 14 hours, beings my drivers were able to keep on working they would leave there trucks on the work site when the work day was done. It will cost the state \$1000 or mean a project may not be completed as they are now facing our Northwest weather.

Your 13 hour and the 1 hour rest break concerns them as they feel they get the rest, they just have to show it as on duty not driving when they are waiting to load or unload, they are able to sit in their truck to relax, take a nap, read they just have to be in attendance.

The majority of our trucks are what they call a day cabs they do not have a sleeper berth, when we spec out a truck we concentrate on driver friendly with seats that fit them and are comfortable, suspension that does not jar your teeth out when you hit a pot hole or beat you to death on roads that need to be upgraded. Trucks today are as close to an RV as you can get, drivers are more rested and do not feel as fatigued after a day's run. It frustrates them to have to stop when they feel good and want to get closer to home, instead of having to spend a night in a motel.

With our drivers we want them to stop in- route ever 3 to 4 hours when they find a safe haven to stretch to get their blood flowing. We want them to pull over and take a power nap whenever they feel drowsy or fatigued, they call us so we can let the customer know if they are running late, we want them their safe and in one piece, just the way they came to work.

The 34 hour restart with the 12 pm to 6am on the front and back will mean that the construction sites that we service will have to reschedule their Mondays as the load they wanted 150 miles away will not be able to load until 7am and will not arrive until noon or 1 pm, pending on how many trucks are waiting to load ahead of him.

When I read the opening remarks on your impending change, it was if I was rereading the same remarks for the current rules from the 2004 HOS change. I believe that if it were not for the lawsuit you are facing we would not be here arguing for this HOS Proposal. My understanding is the state transportation agencies do not even endorse your proposal, due to, they believe the current system works, our state even has creditable data to support that it works, and can show a significant decline in truck at fault crashes and deaths since the 2004 change. No one went to them and ask for their input as to needing a revision, in some of the meetings I have attended where speakers were from the state DOT they said, that they had just completed certifying their inspector to the 2004 change, their concerned for the retraining it's going to take, for the mis interputation that always follows a major revision. Also the ones who filed the suit are not acceptable to your proposal.

I will say that with my companies resilience's that they will try to stay afloat it means passing on the cost to the consumer, it means having to raise our current driver pay package to compensate for the work our drivers will lose or risk losing them to our competitor, we will have to hire more drivers that all have to be trained for handling our products, which are of a hazardous material variety. It means buying more trucks to meet the demand and placing them on the road, which means more vehicles on the road which drive up the risk of accidents. Just one of the things you are trying to avoid. And this is common sense.

We strongly ask for reconsideration to this change, you are in the process of launching the new CSA program, it has the support of trucking companies that are truly committed to safety and like the idea that it's a program that is going to hold carriers that fail to comply accountable and attached to it will also hold the driver accountable. Less give that a chance to see the change, what you're trying to achieve now may be greatly affected by the possibility of CSA.

I am not sure of the year, if it was 2005 or 2006 that you were to make changes to the HOS and you stood your ground and said the new system is working were leaving it as it is.

What happen to the guy or gal who had the spirit, courage, common sense to stand their ground and not let other parts of the government micro manage them? We again strongly ask that you reconsider. All the data show that the current system is a keeper. LET'S KEEP IT.

Respectfully Submitted

Mike Knight

Safety Director.

Oregon 2009 Crash Data

Hrs Driving	Date Report #	Time	Driving/Duty
01			
	04-Jan-09 OR2009430023	08:04	Driving Hrs
	05-Jan-09 OR2009400001	08:45	Driving Hrs
	06-Jan-09 OR2009430011	17:10	Driving Hrs
	07-Jan-09 OR2009400002	08:00	Driving Hrs
	12-Jan-09 OR2009340019	09:59	Driving Hrs
	18-Jan-09 OR2009430025	16:30	Driving Hrs
	23-Jan-09 OR2009220001	08:10	Driving Hrs
	25-Jan-09 OR2009260008	13:45	Driving Hrs
	27-Jan-09 OR2009410007	08:00	Driving Hrs
	28-Jan-09 OR2009420058	15:40	Driving Hrs
	30-Jan-09 OR2009410005	06:05	Driving Hrs
	03-Feb-09 OR2009420007	06:25	Driving Hrs
	06-Feb-09 OR2009400005	07:35	Driving Hrs
	07-Feb-09 OR2009430022	08:37	Driving Hrs
	11-Feb-09 OR2009200005	09:50	Driving Hrs
	13-Feb-09 OR2009420015	12:10	Driving Hrs
	16-Feb-09 OR2009240018	10:12	Driving Hrs
	17-Feb-09 OR2009430163	09:30	Driving Hrs
	23-Feb-09 OR2009260005	06:00	Driving Hrs
	26-Feb-09 OR2009430047	02:50	Driving Hrs
	27-Feb-09 OR2009430051	03:13	Driving Hrs
	08-Mar-09 OR2009220003	12:03	Driving Hrs
	09-Mar-09 OR2009420021	10:40	Driving Hrs
	13-Mar-09 OR2009240014	20:30	Driving Hrs
	13-Mar-09 OR2009290005	15:30	Driving Hrs
	23-Mar-09 OR2009260012	07:45	Driving Hrs
	26-Mar-09 OR2009290006	12:09	Driving Hrs
	29-Mar-09 OR2009020001	14:30	Driving Hrs
	03-Apr-09 OR2009430088	11:35	Driving Hrs
	06-Apr-09 OR2009060003	05:30	Driving Hrs
	06-Apr-09 OR2009150005	11:20	Driving Hrs
	06-Apr-09 OR2009420032	07:50	Driving Hrs
	07-Apr-09 OR2009030021	02:30	Driving Hrs
	13-Apr-09 OR2009300003	07:15	Driving Hrs
	14-Apr-09 OR2009430134	07:35	Driving Hrs

Hrs Driving	Date Report #	Time	Driving/Duty
	15-Apr-09 OR2009030022	07:40	Driving Hrs
	17-Apr-09 OR2009430101	10:36	Driving Hrs
	18-Apr-09 OR2009430102	07:05	Driving Hrs
	19-Apr-09 OR2009400112	07:45	Driving Hrs
	21-Apr-09 OR2009430103	13:30	Driving Hrs
	29-Apr-09 OR2009420039	02:07	Driving Hrs
	29-Apr-09 OR2009430110	07:22	Driving Hrs
	05-May-09 OR2009420041	09:30	Driving Hrs
	11-May-09 OR2009100008	02:05	Driving Hrs
	11-May-09 OR2009260030	23:45	Driving Hrs
	27-May-09 OR2009430129	06:15	Driving Hrs
	28-May-09 OR2009150008	16:00	Driving Hrs
	03-Jun-09 OR2009310001	07:20	Driving Hrs
	08-Jun-09 OR2009260044	06:05	Driving Hrs
	10-Jun-09 OR2009400040	10:54	Driving Hrs
	11-Jun-09 OR2009100013	08:50	Driving Hrs
	25-Jun-09 OR2009420063	06:45	Driving Hrs
	30-Jun-09 OR2009420067	09:10	Driving Hrs
	02-Jul-09 OR2009150010	16:00	Driving Hrs
	12-Jul-09 OR2009430167	11:30	Driving Hrs
	15-Jul-09 OR2009060008	04:41	Driving Hrs
	20-Jul-09 OR2009300006	12:41	Driving Hrs
	21-Jul-09 OR2009100019	07:50	Driving Hrs
	21-Jul-09 OR2009100034	10:00	Driving Hrs
	21-Jul-09 OR2009430173	11:45	Driving Hrs
	28-Jul-09 OR2009420084	10:54	Driving Hrs
	03-Aug-09 OR2009260070	07:53	Driving Hrs
	10-Aug-09 OR2009260072	05:30	Driving Hrs
	10-Aug-09 OR2009430195	11:40	Driving Hrs
	11-Aug-09 OR2009240036	07:53	Driving Hrs
	12-Aug-09 OR2009100021	12:48	Driving Hrs
	16-Aug-09 OR2009150016	12:30	Driving Hrs
	25-Aug-09 OR2009400104	14:16	Driving Hrs
	28-Aug-09 OR2009430315	06:30	Driving Hrs
	31-Aug-09 OR2009060010	04:30	Driving Hrs
	01-Sep-09 OR2009240078	07:10	Driving Hrs
	01-Sep-09 OR2009410037	15:27	Driving Hrs
	02-Sep-09 OR2009200053	16:30	Driving Hrs
	14-Sep-09 OR2009400074	18:10	Driving Hrs

Hrs Driving	Date	Report #	Time	Driving/Duty
	15-Sep-09	OR2009260084	07:00	Driving Hrs
	17-Sep-09	OR2009260089	08:40	Driving Hrs
	18-Sep-09	OR2009240075	13:55	Driving Hrs
	23-Sep-09	OR2009420106	14:52	Driving Hrs
	30-Sep-09	OR2009260092	11:00	Driving Hrs
	01-Oct-09	OR2009420110	07:20	Driving Hrs
	05-Oct-09	OR2009430341	08:25	Driving Hrs
	06-Oct-09	OR2009400079	11:58	Driving Hrs
	08-Oct-09	OR2009240072	06:25	Driving Hrs
	10-Oct-09	OR2009300008	15:55	Driving Hrs
	11-Oct-09	OR2009430369	06:30	Driving Hrs
	14-Oct-09	OR2009400083	04:00	Driving Hrs
	15-Oct-09	OR2009210009	06:00	Driving Hrs
	26-Oct-09	OR2009300010	09:11	Driving Hrs
	27-Oct-09	OR2009260116	06:13	Driving Hrs
	29-Oct-09	OR2009260153	07:30	Driving Hrs
	06-Nov-09	OR2009310003	06:55	Driving Hrs
	10-Nov-09	OR2009360022	09:10	Driving Hrs
	11-Nov-09	OR2009220031	05:30	Driving Hrs
	13-Nov-09	OR2009030067	08:38	Driving Hrs
	25-Nov-09	OR2009340050	13:00	Driving Hrs
	27-Nov-09	OR2009240055	05:29	Driving Hrs
	30-Nov-09	OR2009300011	07:55	Driving Hrs
	08-Dec-09	OR2009100035	13:00	Driving Hrs
	11-Dec-09	OR2009400089	23:10	Driving Hrs
	12-Dec-09	OR2009150031	02:30	Driving Hrs
	12-Dec-09	OR2009200045	06:02	Driving Hrs
	12-Dec-09	OR2009400102	08:10	Driving Hrs
	12-Dec-09	OR2009430292	03:25	Driving Hrs
	12-Dec-09	OR2009430349	05:27	Driving Hrs
	14-Dec-09	OR2009340051	05:50	Driving Hrs
	17-Dec-09	OR2009430316	13:45	Driving Hrs
	18-Dec-09	OR2009240063	07:08	Driving Hrs
	22-Dec-09	OR2009430322	11:05	Driving Hrs
	29-Dec-09	OR2009030083	15:00	Driving Hrs
	30-Dec-09	OR2009430329	06:50	Driving Hrs
02				
	05-Jan-09	OR2009430158	04:43	Driving Hrs
	06-Jan-09	OR2009030003	06:30	Driving Hrs

Hrs Driving	Date Report #	Time	Driving/Duty
	15-Jan-09 OR2009420071	08:50	Driving Hrs
	27-Jan-09 OR2009340006	10:00	Driving Hrs
	04-Feb-09 OR2009430031	13:00	Driving Hrs
	06-Feb-09 OR2009240007	10:07	Driving Hrs
	10-Feb-09 OR2009430035	18:00	Driving Hrs
	23-Feb-09 OR2009030016	10:04	Driving Hrs
	26-Feb-09 OR2009430048	06:21	Driving Hrs
	01-Mar-09 OR2009430053	22:43	Driving Hrs
	06-Mar-09 OR2009230001	05:40	Driving Hrs
	06-Mar-09 OR2009430055	07:00	Driving Hrs
	30-Mar-09 OR2009430097	14:45	Driving Hrs
	02-Apr-09 OR2009260014	00:40	Driving Hrs
	20-Apr-09 OR2009200016	17:30	Driving Hrs
	13-May-09 OR2009200013	09:40	Driving Hrs
	02-Jun-09 OR2009150020	09:15	Driving Hrs
	04-Jun-09 OR2009420123	13:45	Driving Hrs
	06-Jun-09 OR2009420051	16:00	Driving Hrs
	11-Jun-09 OR2009220013	09:00	Driving Hrs
	18-Jun-09 OR2009220014	17:08	Driving Hrs
	19-Jun-09 OR2009430235	16:00	Driving Hrs
	26-Jun-09 OR2009260052	09:45	Driving Hrs
	02-Jul-09 OR2009420069	13:22	Driving Hrs
	05-Jul-09 OR2009150011	17:10	Driving Hrs
	06-Jul-09 OR2009430165	09:45	Driving Hrs
	03-Aug-09 OR2009290013	23:24	Driving Hrs
	05-Aug-09 OR2009430189	18:28	Driving Hrs
	06-Aug-09 OR2009020007	09:30	Driving Hrs
	27-Aug-09 OR2009030095	08:10	Driving Hrs
	01-Sep-09 OR2009340034	09:55	Driving Hrs
	02-Sep-09 OR2009260078	09:04	Driving Hrs
	17-Sep-09 OR2009240041	08:00	Driving Hrs
	26-Sep-09 OR2009260090	10:30	Driving Hrs
	02-Oct-09 OR2009420112	14:25	Driving Hrs
	10-Oct-09 OR2009240044	08:15	Driving Hrs
	19-Oct-09 OR2009260109	06:15	Driving Hrs
	04-Nov-09 OR2009090017	08:20	Driving Hrs
	06-Nov-09 OR2009420133	09:20	Driving Hrs
	06-Nov-09 OR2009430262	15:41	Driving Hrs
	24-Nov-09 OR2009430281	11:51	Driving Hrs

Hrs Driving	Date Report #	Time	Driving/Duty
	12-Dec-09 OR2009430296	09:10	Driving Hrs
	15-Dec-09 OR2009420153	09:00	Driving Hrs
	21-Dec-09 OR2009430321	23:20	Driving Hrs

03

	18-Jan-09 OR2009420006	02:45	Driving Hrs
	26-Jan-09 OR2009260058	10:59	Driving Hrs
	05-Feb-09 OR2009030013	05:00	Driving Hrs
	12-Feb-09 OR2009400010	09:15	Driving Hrs
	22-Feb-09 OR2009260051	11:00	Driving Hrs
	23-Feb-09 OR2009430045	21:10	Driving Hrs
	27-Feb-09 OR2009100003	11:08	Driving Hrs
	09-Mar-09 OR2009430067	09:58	Driving Hrs
	18-Mar-09 OR2009170002	09:49	Driving Hrs
	27-Mar-09 OR2009170003	14:15	Driving Hrs
	27-Mar-09 OR2009290007	10:30	Driving Hrs
	09-Apr-09 OR2009430098	21:35	Driving Hrs
	15-Apr-09 OR2009430135	09:43	Driving Hrs
	22-Apr-09 OR2009040004	10:23	Driving Hrs
	23-Apr-09 OR2009430104	09:26	Driving Hrs
	28-Apr-09 OR2009410010	11:30	Driving Hrs
	28-Apr-09 OR2009430126	14:15	Driving Hrs
	06-May-09 OR2009430212	07:48	Driving Hrs
	17-May-09 OR2009410013	14:07	Driving Hrs
	19-May-09 OR2009220022	07:51	Driving Hrs
	26-May-09 OR2009430128	09:50	Driving Hrs
	27-May-09 OR2009150007	10:30	Driving Hrs
	28-May-09 OR2009240024	09:37	Driving Hrs
	04-Jun-09 OR2009260042	16:12	Driving Hrs
	23-Jun-09 OR2009150009	14:55	Driving Hrs
	07-Jul-09 OR2009430157	11:09	Driving Hrs
	15-Jul-09 OR2009150013	11:30	Driving Hrs
	16-Jul-09 OR2009400049	11:21	Driving Hrs
	28-Jul-09 OR2009030034	09:00	Driving Hrs
	11-Aug-09 OR2009430304	22:15	Driving Hrs
	14-Aug-09 OR2009200026	13:46	Driving Hrs
	17-Aug-09 OR2009260075	09:50	Driving Hrs
	24-Aug-09 OR2009020008	11:53	Driving Hrs
	01-Sep-09 OR2009100022	10:55	Driving Hrs
	02-Sep-09 OR2009030040	18:55	Driving Hrs

Hrs Driving	Date Report #	Time	Driving/Duty
	09-Sep-09 OR2009430344	12:30	Driving Hrs
	21-Sep-09 OR2009260108	07:30	Driving Hrs
	06-Oct-09 OR2009040018	08:38	Driving Hrs
	09-Oct-09 OR2009360015	16:47	Driving Hrs
	13-Oct-09 OR2009400115	05:55	Driving Hrs
	20-Oct-09 OR2009420168	07:30	Driving Hrs
	24-Oct-09 OR2009260111	03:50	Driving Hrs
	26-Oct-09 OR2009260113	13:30	Driving Hrs
	27-Oct-09 OR2009140004	10:35	Driving Hrs
	29-Oct-09 OR2009030063	07:49	Driving Hrs
	02-Nov-09 OR2009200039	14:30	Driving Hrs
	22-Nov-09 OR2009420175	06:15	Driving Hrs
	24-Nov-09 OR2009430282	14:09	Driving Hrs
	25-Nov-09 OR2009260155	06:45	Driving Hrs
	04-Dec-09 OR2009420142	08:20	Driving Hrs
	04-Dec-09 OR2009430368	08:20	Driving Hrs
	16-Dec-09 OR2009420157	10:36	Driving Hrs
	21-Dec-09 OR2009200048	08:30	Driving Hrs
	28-Dec-09 OR2009030082	08:00	Driving Hrs

04

	03-Jan-09 OR2009430002	00:10	Driving Hrs
	12-Jan-09 OR2009430030	20:23	Driving Hrs
	19-Jan-09 OR2009040002	08:09	Driving Hrs
	22-Jan-09 OR2009430059	22:15	Driving Hrs
	23-Jan-09 OR2009400003	18:00	Driving Hrs
	04-Feb-09 OR2009430021	08:30	Driving Hrs
	19-Feb-09 OR2009400041	17:55	Driving Hrs
	24-Feb-09 OR2009420017	11:15	Driving Hrs
	24-Feb-09 OR2009430034	04:05	Driving Hrs
	27-Feb-09 OR2009430052	07:52	Driving Hrs
	03-Mar-09 OR2009430096	19:00	Driving Hrs
	04-Mar-09 OR2009430061	08:04	Driving Hrs
	05-Mar-09 OR2009260009	12:00	Driving Hrs
	09-Mar-09 OR2009430069	23:15	Driving Hrs
	11-Mar-09 OR2009260010	11:00	Driving Hrs
	23-Mar-09 OR2009260018	11:05	Driving Hrs
	16-Apr-09 OR2009260035	14:30	Driving Hrs
	20-Apr-09 OR2009260021	10:30	Driving Hrs
	28-Apr-09 OR2009430108	05:15	Driving Hrs

Hrs Driving	Date	Report #	Time	Driving/Duty
	29-Apr-09	OR2009260023	13:54	Driving Hrs
	12-May-09	OR2009220007	07:50	Driving Hrs
	02-Jun-09	OR2009430139	02:05	Driving Hrs
	05-Jun-09	OR2009260043	15:00	Driving Hrs
	30-Jun-09	OR2009030024	16:15	Driving Hrs
	01-Jul-09	OR2009200027	11:16	Driving Hrs
	09-Jul-09	OR2009360003	15:00	Driving Hrs
	11-Jul-09	OR2009420075	14:42	Driving Hrs
	19-Jul-09	OR2009430312	12:56	Driving Hrs
	22-Jul-09	OR2009340024	12:40	Driving Hrs
	03-Aug-09	OR2009150012	14:45	Driving Hrs
	12-Aug-09	OR2009400063	20:02	Driving Hrs
	18-Aug-09	OR2009050007	09:45	Driving Hrs
	21-Aug-09	OR2009180007	13:45	Driving Hrs
	24-Aug-09	OR2009340032	10:48	Driving Hrs
	08-Sep-09	OR2009260080	12:00	Driving Hrs
	18-Sep-09	OR2009430210	06:28	Driving Hrs
	21-Sep-09	OR2009430215	19:03	Driving Hrs
	27-Sep-09	OR2009430217	14:36	Driving Hrs
	01-Oct-09	OR2009430285	16:30	Driving Hrs
	06-Oct-09	OR2009310002	09:15	Driving Hrs
	09-Oct-09	OR2009420116	15:47	Driving Hrs
	15-Oct-09	OR2009030057	10:32	Driving Hrs
	02-Dec-09	OR2009360026	13:15	Driving Hrs
	07-Dec-09	OR2009420145	15:15	Driving Hrs
	12-Dec-09	OR2009030073	09:13	Driving Hrs
	12-Dec-09	OR2009200044	03:58	Driving Hrs
	18-Dec-09	OR2009340054	14:30	Driving Hrs
	22-Dec-09	OR2009270006	09:00	Driving Hrs
	30-Dec-09	OR2009260143	05:26	Driving Hrs
	30-Dec-09	OR2009260144	05:26	Driving Hrs

05

	19-Jan-09	OR2009220016	07:00	Driving Hrs
	03-Feb-09	OR2009140001	15:15	Driving Hrs
	24-Mar-09	OR2009160001	09:15	Driving Hrs
	09-Apr-09	OR2009240020	15:30	Driving Hrs
	11-Apr-09	OR2009410009	18:42	Driving Hrs
	06-May-09	OR2009090011	10:00	Driving Hrs
	11-May-09	OR2009260031	14:48	Driving Hrs

Hrs Driving	Date	Report #	Time	Driving/Duty
	22-May-09	OR2009220009	14:20	Driving Hrs
	26-May-09	OR2009100011	14:45	Driving Hrs
	28-May-09	OR2009260034	11:43	Driving Hrs
	03-Jun-09	OR2009260039	02:53	Driving Hrs
	04-Jun-09	OR2009420050	11:45	Driving Hrs
	24-Jul-09	OR2009420083	17:20	Driving Hrs
	27-Aug-09	OR2009340053	15:00	Driving Hrs
	09-Sep-09	OR2009410021	22:20	Driving Hrs
	16-Sep-09	OR2009030046	10:59	Driving Hrs
	27-Sep-09	OR2009230005	05:50	Driving Hrs
	03-Oct-09	OR2009260093	10:25	Driving Hrs
	05-Oct-09	OR2009260095	10:53	Driving Hrs
	09-Oct-09	OR2009290016	15:47	Driving Hrs
	29-Oct-09	OR2009430261	19:43	Driving Hrs
	09-Nov-09	OR2009240051	14:15	Driving Hrs
	02-Dec-09	OR2009400099	18:00	Driving Hrs
	11-Dec-09	OR2009430291	19:00	Driving Hrs
	13-Dec-09	OR2009180013	21:52	Driving Hrs
	14-Dec-09	OR2009420150	23:40	Driving Hrs
	17-Dec-09	OR2009260137	00:35	Driving Hrs
	31-Dec-09	OR2009430338	12:45	Driving Hrs

06

	19-Jan-09	OR2009290004	10:45	Driving Hrs
	30-Jan-09	OR2009410004	13:15	Driving Hrs
	06-Feb-09	OR2009400026	17:45	Driving Hrs
	10-Feb-09	OR2009090003	19:35	Driving Hrs
	12-Feb-09	OR2009410016	13:40	Driving Hrs
	27-Feb-09	OR2009240019	14:30	Driving Hrs
	03-Mar-09	OR2009400016	20:45	Driving Hrs
	09-Mar-09	OR2009430068	16:50	Driving Hrs
	27-Mar-09	OR2009420026	10:10	Driving Hrs
	31-Mar-09	OR2009070003	16:30	Driving Hrs
	16-Apr-09	OR2009400031	13:12	Driving Hrs
	29-Apr-09	OR2009420101	19:00	Driving Hrs
	21-May-09	OR2009420109	17:54	Driving Hrs
	11-Jun-09	OR2009260046	14:00	Driving Hrs
	15-Jun-09	OR2009430147	03:18	Driving Hrs
	17-Jun-09	OR2009430148	13:39	Driving Hrs
	23-Jun-09	OR2009090007	10:30	Driving Hrs

Hrs Driving	Date	Report #	Time	Driving/Duty
	06-Jul-09	OR2009030027	13:30	Driving Hrs
	06-Jul-09	OR2009260054	15:26	Driving Hrs
	23-Jul-09	OR2009260114	14:10	Driving Hrs
	24-Jul-09	OR2009100020	18:18	Driving Hrs
	31-Jul-09	OR2009430179	19:04	Driving Hrs
	08-Aug-09	OR2009430196	00:00	Driving Hrs
	14-Aug-09	OR2009040010	08:30	Driving Hrs
	18-Aug-09	OR2009400066	12:54	Driving Hrs
	20-Aug-09	OR2009220034	14:15	Driving Hrs
	29-Aug-09	OR2009420092	08:45	Driving Hrs
	03-Sep-09	OR2009200030	04:00	Driving Hrs
	19-Sep-09	OR2009030048	06:40	Driving Hrs
	07-Oct-09	OR2009340040	13:15	Driving Hrs
	13-Oct-09	OR2009430240	23:15	Driving Hrs
	23-Oct-09	OR2009420169	13:05	Driving Hrs
	14-Nov-09	OR2009400091	23:28	Driving Hrs
	09-Dec-09	OR2009400100	13:57	Driving Hrs
	16-Dec-09	OR2009260136	13:30	Driving Hrs
	22-Dec-09	OR2009240066	15:13	Driving Hrs
	28-Dec-09	OR2009150032	15:13	Driving Hrs
	29-Dec-09	OR2009400110	22:29	Driving Hrs

07

	09-Jan-09	OR2009040001	12:30	Driving Hrs
	12-Jan-09	OR2009430013	17:10	Driving Hrs
	19-Jan-09	OR2009050001	12:30	Driving Hrs
	20-Jan-09	OR2009200003	15:45	Driving Hrs
	21-Jan-09	OR2009430019	06:10	Driving Hrs
	14-Feb-09	OR2009420028	01:30	Driving Hrs
	23-Feb-09	OR2009400014	23:05	Driving Hrs
	26-Feb-09	OR2009430087	05:15	Driving Hrs
	03-Mar-09	OR2009200009	13:30	Driving Hrs
	06-Mar-09	OR2009430064	08:50	Driving Hrs
	17-Mar-09	OR2009060001	04:49	Driving Hrs
	25-Mar-09	OR2009430078	11:20	Driving Hrs
	14-Apr-09	OR2009430100	16:38	Driving Hrs
	28-Apr-09	OR2009420037	07:00	Driving Hrs
	08-May-09	OR2009430117	17:21	Driving Hrs
	28-May-09	OR2009100009	01:10	Driving Hrs
	03-Jun-09	OR2009050005	12:15	Driving Hrs

Hrs Driving	Date	Report #	Time	Driving/Duty
	04-Jun-09	OR2009290011	16:00	Driving Hrs
	10-Jun-09	OR2009420052	11:15	Driving Hrs
	24-Jun-09	OR2009260050	19:44	Driving Hrs
	30-Jun-09	OR2009430156	20:19	Driving Hrs
	07-Jul-09	OR2009200020	13:45	Driving Hrs
	15-Jul-09	OR2009100018	11:00	Driving Hrs
	05-Aug-09	OR2009430194	13:00	Driving Hrs
	25-Aug-09	OR2009400068	07:08	Driving Hrs
	18-Sep-09	OR2009020010	14:09	Driving Hrs
	12-Oct-09	OR2009360016	13:30	Driving Hrs
	19-Oct-09	OR2009260110	09:00	Driving Hrs
	02-Nov-09	OR2009420130	12:34	Driving Hrs
	03-Nov-09	OR2009240077	15:53	Driving Hrs
	03-Nov-09	OR2009420135	15:30	Driving Hrs
	16-Nov-09	OR2009410032	18:50	Driving Hrs
	20-Nov-09	OR2009180014	22:06	Driving Hrs
	23-Nov-09	OR2009200041	17:18	Driving Hrs
	25-Nov-09	OR2009030069	08:30	Driving Hrs
	15-Dec-09	OR2009260131	14:34	Driving Hrs
	15-Dec-09	OR2009430299	00:50	Driving Hrs
	15-Dec-09	OR2009430307	15:00	Driving Hrs

08

	07-Jan-09	OR2009340009	17:15	Driving Hrs
	14-Jan-09	OR2009260057	13:43	Driving Hrs
	15-Jan-09	OR2009340003	14:20	Driving Hrs
	19-Jan-09	OR2009240009	18:29	Driving Hrs
	20-Jan-09	OR2009130001	19:45	Driving Hrs
	25-Jan-09	OR2009400029	22:39	Driving Hrs
	25-Jan-09	OR2009430026	14:58	Driving Hrs
	27-Jan-09	OR2009210006	13:50	Driving Hrs
	28-Jan-09	OR2009430186	04:06	Driving Hrs
	06-Feb-09	OR2009030007	14:00	Driving Hrs
	15-Feb-09	OR2009430044	18:35	Driving Hrs
	13-Mar-09	OR2009430071	09:40	Driving Hrs
	17-Mar-09	OR2009420024	16:01	Driving Hrs
	24-Mar-09	OR2009430077	04:30	Driving Hrs
	05-Apr-09	OR2009430090	17:30	Driving Hrs
	08-May-09	OR2009020003	13:38	Driving Hrs
	05-Jun-09	OR2009340015	15:07	Driving Hrs

Hrs Driving	Date	Report #	Time	Driving/Duty
	19-Jun-09	OR2009260047	14:09	Driving Hrs
	19-Jul-09	OR2009360005	15:15	Driving Hrs
	21-Jul-09	OR2009030032	19:35	Driving Hrs
	31-Jul-09	OR2009430180	21:45	Driving Hrs
	03-Aug-09	OR2009430184	21:00	Driving Hrs
	21-Aug-09	OR2009340036	12:45	Driving Hrs
	22-Aug-09	OR2009300007	06:30	Driving Hrs
	11-Sep-09	OR2009420161	18:30	Driving Hrs
	12-Oct-09	OR2009220026	14:00	Driving Hrs
	13-Oct-09	OR2009400082	22:42	Driving Hrs
	19-Oct-09	OR2009240048	15:12	Driving Hrs
	17-Nov-09	OR2009100028	12:30	Driving Hrs
	22-Nov-09	OR2009410034	13:33	Driving Hrs
	11-Dec-09	OR2009240056	19:39	Driving Hrs
	12-Dec-09	OR2009430354	06:45	Driving Hrs
	29-Dec-09	OR2009100032	22:00	Driving Hrs
	29-Dec-09	OR2009430357	22:15	Driving Hrs

09

	15-Mar-09	OR2009420089	14:20	Driving Hrs
	20-Mar-09	OR2009260064	15:00	Driving Hrs
	01-Apr-09	OR2009430099	22:00	Driving Hrs
	02-Apr-09	OR2009420029	17:45	Driving Hrs
	01-May-09	OR2009400033	21:53	Driving Hrs
	06-May-09	OR2009260029	07:20	Driving Hrs
	12-May-09	OR2009240025	07:44	Driving Hrs
	12-Jun-09	OR2009420053	16:45	Driving Hrs
	22-Jun-09	OR2009420064	17:00	Driving Hrs
	28-Jun-09	OR2009430154	22:25	Driving Hrs
	21-Aug-09	OR2009340052	15:50	Driving Hrs
	21-Aug-09	OR2009430200	03:34	Driving Hrs
	30-Sep-09	OR2009410025	23:20	Driving Hrs
	21-Oct-09	OR2009430346	05:20	Driving Hrs
	01-Dec-09	OR2009420141	15:30	Driving Hrs
	20-Dec-09	OR2009420162	01:15	Driving Hrs
	23-Dec-09	OR2009030081	16:10	Driving Hrs

10

	22-Jan-09	OR2009430017	07:15	Driving Hrs
	10-Feb-09	OR2009400021	23:05	Driving Hrs

Hrs Driving	Date	Report #	Time	Driving/Duty
	16-Apr-09	OR2009400037	16:57	Driving Hrs
	30-Jun-09	OR2009020004	14:10	Driving Hrs
	30-Jun-09	OR2009030025	14:30	Driving Hrs
	09-Jul-09	OR2009400044	15:00	Driving Hrs
	14-Jul-09	OR2009360006	16:20	Driving Hrs
	15-Jul-09	OR2009220017	17:57	Driving Hrs
	15-Jul-09	OR2009420078	16:45	Driving Hrs
	05-Aug-09	OR2009260132	09:00	Driving Hrs
	19-Oct-09	OR2009260170	19:35	Driving Hrs
	13-Nov-09	OR2009430269	15:00	Driving Hrs
	20-Nov-09	OR2009430351	19:48	Driving Hrs
11				
	01-Jun-09	OR2009430138	22:39	Driving Hrs
	06-Jul-09	OR2009260055	17:10	Driving Hrs
12				
	27-Jan-09	OR2009260004	07:15	Driving Hrs
	10-Feb-09	OR2009420012	18:00	Driving Hrs
	23-Feb-09	OR2009260016	08:00	Driving Hrs
	28-Apr-09	OR2009300002	04:30	Driving Hrs
	22-Jul-09	OR2009400053	04:45	Driving Hrs
	30-Jul-09	OR2009340025	13:30	Driving Hrs
13				
	11-Aug-09	OR2009260073	19:00	Driving Hrs
	19-Sep-09	OR2009260087	19:38	Driving Hrs
	10-Dec-09	OR2009420152	15:10	Driving Hrs
14				
	10-Feb-09	OR2009400008	17:10	Driving Hrs
	23-Nov-09	OR2009420176	04:49	Driving Hrs
	29-Dec-09	OR2009400107	07:15	Driving Hrs
15				
	02-Jun-09	OR2009430140	12:38	Driving Hrs
17				
	14-May-09	OR2009430122	18:19	Driving Hrs
18				
	05-Feb-09	OR2009420059	10:45	Driving Hrs
	02-Dec-09	OR2009030071	16:15	Driving Hrs

Hrs Driving	Date	Report #	Time	Driving/Duty
19				
	12-May-09	OR2009090005	13:29	Driving Hrs
	02-Dec-09	OR2009200042	11:34	Driving Hrs
20				
	03-Apr-09	OR2009340012	15:00	Driving Hrs
	28-Oct-09	OR2009030062	09:20	Driving Hrs
24				
	08-Jul-09	OR2009420070	05:52	Driving Hrs
	26-Aug-09	OR2009070005	06:15	Driving Hrs
	12-Dec-09	OR2009420148	08:35	Driving Hrs
28				
	11-Feb-09	OR2009400009	19:57	Driving Hrs
	14-May-09	OR2009400034	01:00	Driving Hrs
30				
	11-Feb-09	OR2009170001	11:50	Driving Hrs
	13-May-09	OR2009260036	16:30	Driving Hrs
31				
	20-Jan-09	OR2009240006	10:45	Driving Hrs
	20-Aug-09	OR2009260076	11:48	Driving Hrs
32				
	23-Oct-09	OR2009340042	14:27	Driving Hrs
35				
	04-Aug-09	OR2009030035	13:30	Driving Hrs
38				
	16-Jan-09	OR2009040008	08:09	Driving Hrs
43				
	13-Dec-09	OR2009420149	07:16	Driving Hrs
46				
	28-Aug-09	OR2009240038	13:55	Driving Hrs
49				
	29-Jul-09	OR2009430176	15:30	Driving Hrs
55				
	22-Jun-09	OR2009420060	17:17	Driving Hrs
57				