



QA 17584

March 15, 1993

FHWA-97-2176-11

TO:

Mr. Charles Medaion
Department of Transportation
Federal Highway Administration
Docket No. MC-92-10, Room 4232, HCC-10
49CFR Part 383
Office of Chief Counsel
400 Seventh Street S. W
Washington, D. C. 20590

FROM

Ross C. Gaussoin, President
Silver Eagle Company
700 North Hayden Island Drive, Suite 170
Portland, OR 97217

RESPONSE TO: Mandatory Minimum Training Requirements for Operators of Longer Combination Vehicles (LCV's).

COMMENTS ISSUED: As regards Federal Register, Volume 58, Number 10, by Silver Eagle Company MC 32779.

Silver Eagle Company operates as a Federal Certificated Motor Carrier under the above Docket Number in Interstate Commerce throughout the states of Oregon, Washington and Idaho and in intrastate commerce in Oregon and Washington. Silver Eagle has operated continuously in this capacity from its incorporation date in 1933. The company today operates in excess of 200 power units, transporting general commodities, exceeding 100 road schedules per day. The company employs in excess of 500 full time personnel.

Silver Eagle Company operates triple trailer combinations in daily operation throughout the states of Oregon and Idaho. In this capacity, approximately 35% of the company's daily road schedules operate with triple trailer combinations (weather permitting). These combinations have operated continuously since 1967, and in that period of time the company has had no injury accidents with these combinations. Our records disclose one D.O.T. reportable accident with a triple trailer combination, such accident having occurred in 1986. The accident created \$7,668.46 in equipment damage.

It is our opinion that special training requirements for LCV drivers are minimal in terms of their relationship to existing training requirements for all multiple trailer combinations. All of Silver Eagle Company's line drivers are qualified to transport triple trailers, and do so daily.

Our training and qualification requirements for all triples operators are as follows:

1. Two year's minimum experience with articulated combination vehicles (doubles/triples) to include winter driving, preferably in our area of operation.
2. All new hires are required to spend a minimum of two days with a senior qualified driver instructor for the purpose of training and road testing prior to being qualified as an LCV operator.

Our operating conduct in terms of transport equipment and operators is as follows:

1. We make certain that all vehicles are maintained at extremely high levels of mechanical efficiency. All line haul power units are maintained with a maximum age of six years.
2. It has long been our operating conduct to see that we operate with a strong safety psychology in mind as far as equipment design.
 - (a) All line haul power units are equipped with ABS braking systems.
 - (b) All engines in today's power fleet are operating with electronic engines which prohibit speeds in excess of 62 miles per hour.
3. Triple trailer permit requirements in Oregon are followed rigidly, which includes spray suppressant mud flaps. In addition, Silver Eagle's line equipment is equipped with aerodynamic packages to include rounded front bumper with a wind dam as well as full fairing on the cab to further reduce splash and spray during rainy weather.
4. Silver Eagle Company has long believed in safety incentivizing all company transport operators through clothing and other gifts for safety achievement.
5. Silver Eagle Company presently has 90 of the company's drivers having been enrolled in the National Safety Council Million Mile Award Program
6. Silver Eagle Company's safety record has consistently placed the company in a position to be able to compete for attractive insurance rates. The economics involved in insurance demands a high level of safety conduct, and we work hard to reach that level of achievement.

It is our belief that our safety experience, in essence, speaks for itself. Our record of transport driver training does not involve extensive triple trailer training as compared to double trailer training. In this regard, it is our experienced view that drivers engaging in transport of these longer combination vehicles "step up" to an improved safety psychology due to the virtual size of the vehicle, 105' versus 75'. I refer to this as the "747 Principle" in reference to pilots flying larger versus smaller aircraft.

It is our view that creating significant variance from present sound fleet training and qualification procedures are not essential to fleet safety improvement. The record of all fleets in the LCV area clearly discloses a safety psychology and fleet operating practice which is clear in its superior record over other line haul vehicle statistics.

Sincerely,

SILVER EAGLE COMPANY



Ross C. Gaussoin
President

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