



# Iowa Department of Transportation

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July 7, 1993

FHWA Docket No. MC 92-4  
Room 4232, HCC-10  
Attn: Lee Jackson  
Office of the Chief Counsel  
Federal Highway Administration  
400 Seventh Street SW  
Washington, DC 20590

FHWA-97-2180-4

Dear Mr. Jackson:

The Iowa Department of Transportation, Motor Vehicle Division, would like to make the following comments regarding FHWA Docket No. MC 92-4 Motor Carrier Safety Permits.

The feasibility of coordinating and/or consolidating of FHWA's safety permit and RSPA's registration program:

The safety and registration permit should be controlled by the U.S. DOT Number. The safety permit and registration should expire annually. FHWA and RSPA should share data as they are almost duplicate information requirements. Create one form for FHWA and RSPA that would cover both Registration and Permitting for Motor Carriers. This would reduce the amount of paper work that Motor Carriers and State Enforcement Personnel would have to keep track of.

Inspection of Highway Route Controlled Quantity of Radioactive Materials:

A Level One inspection should be mandatory for HRC as well as the other "high risk" Hazardous Materials before each trip. Radiological monitoring should be included in the inspection of HRC transport vehicles before each trip and possibly several times during the trip, depending on length of trip. In addition, an end-of-trip monitoring should take place.

Sincerely,

*Shirley E. Andre*  
Shirley E. Andre, Director  
Motor Vehicle Division

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