

3M Logistics

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August 2, 1993

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

Re: Docket No. MC 92-4
Notice of Proposed Rulemaking **FHWA-97-2180-7**

Please accept **3M's** comments for the record pertaining to the addition of new Subpart B, Motor Carrier Safety Permits.

3M supports the establishment of a motor carrier safety permit program, but urges the proposed rulemaking not establish a cumbersome or unnecessary process.

3M offers the following comments:

1. Clarify the party responsible for affixing safety permit numbers and acceptable methods of affixing safety permit numbers to shipping papers.

This clarification is necessary to ensure that the shipper is not placed in a position of accepting the carrier's responsibility for affixing permit numbers on shipping papers.

2. Enforcement and compliance should be linked to existing programs, compliance reviews and roadside inspections.

Because compliance will be required of all motor carriers, the shipper industry should not be forced to verify that a motor carrier's obligation has been met.

3M urges that this program be kept simple and straightforward, which will ensure efficient compliance from the motor carrier industry.

Yours very truly,

Linda L. Skistad

Linda L. Skistad
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LLS/les

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