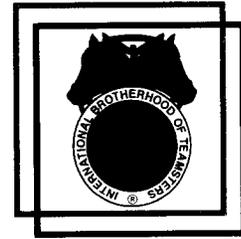


INTERNATIONAL  
BROTHERHOOD OF TEAMSTERS

AFL-CIO



OFFICE OF  
RON CAREY  
GENERAL PRESIDENT

QA  
17865

August 16, 19

Office of the Chief Counsel  
Federal Highway Administration  
400 Seventh Street SW, Room 4232  
Washington, DC 20590

RE: FHWA Docket No. MC 92-4

FHWA-97-2180-36

REC'D  
93 AUG 17 11:50  
LHCOS./REGS. DIV.

Dear Sir or Madam,

On behalf of hundreds of thousands of truck drivers who are members of the International Brotherhood of Teamsters, I wish to express our Union's strong support for the establishment of a motor carrier safety permit program for the transportation of designated high risk hazardous materials.

We believe this proposed rule would increase regulatory compliance, enhance motor carrier safety, and promote the safe transportation of the designated hazardous materials. Important safety and health protections for truck drivers, and for all who share the roads with trucks carrying hazardous materials will be improved.

While we support the proposed rulemaking as written, we would like to further support a decision to expand the safety permit regulations to include all hazardous materials.

The proposed rulemaking requires a motor carrier to meet the "Safety Fitness Procedures" of 49 CFR Part 385 in making determinations whether to issue, or deny, a request for a safety permit. These include acceptable compliance with such standards as: Inadequate inspection, repair, and maintenance of vehicles (Part 396), The use of fatigued drivers (Part 395) and Motor vehicle accidents and hazardous materials incidents.

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Office of the Chief Council  
Federal Highway Administration  
August 16, 1993

Motor carriers transporting mixed loads of non-high risk hazardous materials, such as acetone (Class 3) and acetic acid (Class 8) should be subject to the same permitting requirements which will increase compliance with the above mentioned safety standards. Hazardous materials incidents have not been isolated to the high risk materials designated in the proposed rulemaking, rather, these incidents have involved all classes of hazmat. Again, we support a FHWA decision to expand the safety permit to include all classes of hazardous materials.

We hope that FHWA will move ahead expeditiously with this rulemaking. We look forward to seeing the Final Rule in the near future.

Sincerely yours,

A handwritten signature in cursive script that reads "Dennis Skelton/BB". The signature is written in black ink and is positioned above the typed name of the sender.

Dennis Skelton, Acting Director  
National Freight Division

DS/bjb

cc: Ron Carey, General President  
Frank Goldsmith, Director, Safety and Health Department  
David Sweeney, Director, Legislative Department  
David Mallino, Connerton, Ray & Simon