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March 26, 1993

Mr. Dan Hartman  
FHWA Motorcoach & Special Programs  
Division

U. S. Dept. of Transportation

Dear Mr. Hartman:

I would like to thank you for the opportunity to meet you and to share my thoughts at the UBOA/ABA Florida convention on rewriting of the motor carrier regulations. I will try to be brief as I am sure you have hundreds of letters to review and since I was given the opportunity to testify during the session in Miami.

Since returning home from Florida to our charter business we have run several charters that strengthen my feelings about some of the things that I testified of. . . .we have gotten into our annual spring break trips to Florida driving straight through both ways and we also encountered and was also caught in the blizzard of 1993.

In all of these college trips to Florida the routine is pretty much the same. . . .pick them up on Friday evening as soon as school closes. . . .driving straight through to the beaches. The drivers (basically part time or semi-retired) having slept thursday night (as normal), (1) either trying to sleep in late Friday morning or (2) trying to catch an early afternoon nap, pick up their passengers around 6:00 p.m. and then proceed for the next **10-12** hours to drive (drive with rest/eat stops) all night until about 5:00 or 6:00 a.m. in the morning where a previously spotted second driver takes over and concludes the run.

My point being that the first driver has not gotten the same quality of rest that the second driver has. . . .and the first driver has to 'run through the darkness of the night which is more susceptible to falling a sleep or dozing at the wheel.

I believe there is a better way to handle this often run charter. . . .there are hundreds of other charters that run this type of schedule. . . .particularly the Friday night weekend bingo runs, Atlantic City, etc. Since we are operating with regulations that were made in **1935**. . . .there is no comparison at all with Interstate Highways compared to the roads prior to about **1960**, nor can there be any comparison to the equipment. The modern motor coach, riding on air, wide bodied, with very comfortable reclining seats is in another world to the equipment that was being run in the 30's and 40's.

I believe it many many times safer to allow 2 team drivers to make the above described run. . . .alternating driving with each having a maximum of 10 hours each driving with an additional 5 hours on duty not driving time for normal rest and eating stops. This would not force the first driver who may experience drowsiness

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to have to continue . . . just because this is what is expected . . . or because the schedule demands it. Instead, the second driver . . . who has been resting in a recliner could take over and allow the first driver to relax, close his eyes, sleep, nap or whatever. The airline industry has mandatorily used this concept and I believe public safety would be enhanced if the motor coach industry was able to use this concept.

Also . . . regulations written that would allow a sleeper berth for motor coaches would even be more helpful. We installed 4 coaches with sleeper berths at one time only to find out that they were not according to FMCR. Again, the transverse requirement is the only way that said berth could be mounted in a truck cab but will not work at all in a motor coach. Designing regulations that would make motor coach berths fitted and retrofitted in coaches would be most helpful.

Needless to say . . . most all motor coach operators would like to have a separate reg book that pertained to our industry. Tourism is a very major business as is trucking and we deserve a simplified reg book for motor coach and passenger service.

As I began . . . I will try to be short and I believe I have done so. I have addressed only three issues . . . the first two (1) team drivers and (2) Sleeper berths, are probably the two issues that most affect us. My school bus DOT inspector is on a committee to rewrite the specifications for school buses in our state. I believe he told me that they have not been rewritten for about 8 years. I can appreciate the task that you are attempting to accomplish and wish you God speed. Why regulations that were put in effect shortly after the days of horses and oxen have not been updated as the world changes is dumbfounding to me.

Sincerely,  
*Ron Halbert*  
Ron Halbert, President  
Econoway Motor Coach Inc.

cc/ABA/UBOA

*Ron  
Where are we on our  
separate FMCSRs for  
Motor Coaches*

*Bryan*