

18346 QA

June 10, 1994

948N 550E  
Westville, IN 46391

Federal Highway Administration's Motorcoach Division  
FHWA  
Docket-93-~~3~~4 MC-93-34  
HCC-10  
Room 4232

Office of Chief Counsel  
Federal Highway Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

To Whom it may concern:

Of my 24 years in the motorcoach industry, as a driver, driver trainer, safety director, rule book writer, and dispatcher, I have never observed nor found reason for a sleeper berth to be connected in any way to a motorcoach.

I have observed only one sleeper berth installed by a manufacturer that legal and workable. This was in a Neoplan Skyliner.

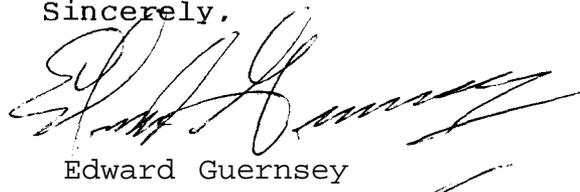
I have never had a conversation with any motorcoach operator who believed a sleeper berth has any validity in a motorcoach. Most drivers that I have conversations with believe the only reason that any type of sleeper berth is incorporated in a motorcoach is done to evade hours of service regulations. Most drivers believe, as I do, that it is just as simple to have driver exchanges set up along the route of any extended move on which a sleep berth would be used.

I have seen various coffins installed in luggage racks, behind the driver's area, above the rear passenger seats, and also the two seats designated as the driver's sleeping area. I do not believe and never have found a driver that believes this is a safe or necessary practice.

There are many companies in the Midwest that I personally know who operate extended moves with two drivers, some using above mentioned "sleeping arrangements." It must be remembered that we haul people not hogs.

I would be interested in your reply.

Sincerely,



Edward Guernsey

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Adm. Serv. Div.

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