



Wisconsin Department of Transportation

Tommy G. Thompson
Governor

Charles H. Thompson
Secretary

OFFICE OF THE SECRETARY
P. O. Box 7910
Madison, WI 53707-7910

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FHWA Docket No. MC-96-18
Federal Highway Administration
Office of the Chief Counsel
HCC-10, Room 4232
400 Seventh Street, S.W.
Washington, DC 20590

FHWA 97-2299-6

QA-20545

LEGS./REGS. DIV.

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FEDERAL HIGHWAY
ADMINISTRATION

Dear Sir/Madam:

The Wisconsin Department of Transportation has previously identified a concern regarding the subjectivity of the Federal Rating System. The notice of proposed rule making appears to be more performance based, rather than a record keeping based decision.

The proposal to be more broad based and include critical and acute violation data to make an unsatisfactory determination appears to be a more effective way to assess a carrier's safety fitness.

The Wisconsin Department of Transportation feels that the 45-day period provided for the carrier to implement corrective measures is an ample period of time to come into compliance and avoid the unsatisfactory rating. The proposed rule is an improvement over the current rating process.

Part 363 Enforcement Proceedings

In our opinion the one thing missing in the driver disqualification process is how state driver licensing agencies are going to be notified when drivers are disqualified. It is very important that all disqualification be indicated on a driver's record.

If you have further questions on these comments, please contact Lt. Lyle Walheim of the Wisconsin State Patrol at (608) 266-0305.

Thank you for the opportunity to comment.

Sincerely,

Charles H. Thompson
Charles H. Thompson
Secretary

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CHT:lwd