

Logistics Systems Information, Inc.



QA-20585

July 10, 1996

FHWA-97-2299-9

FHWA
Office of the Chief Counsel
HCC-10
Room 4232
400 7th St. S.W.
Washington, DC 20590

LEGS./REGS. DIV.

36 JUL 10 4 6 : 59

ADMINISTRATION

Re: Docket No. MC-96-18

Dear Sir/Madame:

My name is Joseph A. BenVenuto, and I am President of Logistics Systems Information, Inc. LSI is a logistics consulting firm, headquartered in Vandalia, OH, offering a full line of services in the areas of traffic, transportation, physical distribution, and fleet operations.

Regarding the proposed rule making, which was published in the April 29 Federal Register, concerning the one-tier "unsatisfactory" safety rating system that is under consideration, I would like to offer the following comments.

Many times, we are asked to identify and recommend motor carriers to our clients. As part of our research, we attempt to ascertain the safety ratings of any carriers that our clients may have under consideration. Under the present system of assigning fleet safety ratings of "satisfactory", "conditional", or "unsatisfactory", it is rather simple to determine if, (1) the motor carrier has minor or no fleet safety related problems, evidenced by a satisfactory rating; (2) the motor carrier has had some safety violations, but the violations were not serious enough to warrant an unsatisfactory safety rating, evidenced by a conditional rating; or, (3) the motor carrier is guilty of serious safety violations; and, therefore, has been awarded an unsatisfactory safety rating.

As I understand the proposed system, since the "satisfactory" and "conditional" ratings would be eliminated, a motor carrier who has not been awarded an "unsatisfactory" fleet safety rating would actually have no safety rating at all. If this be the case, how will we know if a carrier is "unrated" because they have not yet had a

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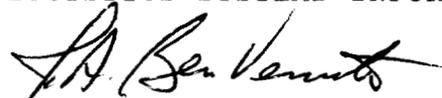
safety compliance review; or, they are unrated because they did have a safety compliance review, but were not found to be "unsatisfactory". In my opinion, this will leave a void that will be extremely difficult to deal with when trying to determine the exact safety status of any motor carrier, and make recommendations accordingly.

I can certainly understand the consideration to eliminate the "conditional" rating status, as this could be viewed as a gray area at best. However, I feel that the "satisfactory", or something similar, and the "unsatisfactory" ratings should be retained. In addition, those carriers who have not been subject to a safety compliance review should continue to be classified as "unrated". Under this system, we can certainly determine if a carrier's safety program is unrated, satisfactory, or unsatisfactory, and make informed decisions accordingly.

Thank you for allowing me the opportunity to offer my comments; and, if additional information is required, please feel free to contact me at any time.

Sincerely,

LOGISTICS SYSTEMS INFORMATION, INC.



Joseph A. BenVenuto
President

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