



TRUCKING, INC.

120 E. National Avenue • Milwaukee, WI 53204-1848

July 15, 1996

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

QA-20593

FHWA -97- 2299 -14

LEGS./REGS. DIV.

96 JUL 23 17:24

FEDERAL HIGHWAY
ADMINISTRATION

Re: Safety Rating Proposal

To Whom It May Concern:

I don't think retaining or not retaining the existing safety rating categories is the problem. What the categories are called or how many there are is not the problem. The problem is how they are established, what criteria determines each one, and how are they administered.

Carriers with known bad records such as accident ratios, hiring practices, running over hours or running overloads should be the FHWA first concern. The industry is well aware that there are bad apples, and who they are. These companies should be first and foremost the priority audits. This practice would have the most impact on safety (get the bad apples out of the industry) and the industry. This alone would help the companies that work hard to comply and run safe legitimate companies be more successful and give them the opportunity to service in an industry with very low margin.

The rating system should definitely reward outstanding carriers, that have worked hard to establish above average programs and have shown their dedication to safety. Safety should be the #1 criteria in establishing what ever rating system is established.

I honestly feel that a company that has a strong commitment to safety is a company that also tries hard to keep the rest of their house in order and that a few paperwork problems should not weigh heavily in the carrier rating.

Recordable accident criteria should be reviewed, the input should come from both FHWA and carriers. This area should be completed before a final decision on rating categories are established.

The trucking industry is so diversified, we really have to establish categories because exposure are different in a long haul, regional and local operations. A lot of thought has to go into establishing the criteria for each one.

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An auditor has to understand the difference in carriers and then be consistent in the determination of the criteria used in the audit. All auditors have to be singing from the same hymn book, inconsistencies in this practice will do nothing but take away from the ultimate goal of having safer highways.

The auditor must look first at the carrier's Safety Policies so they have a good understanding of the carrier's commitment. Then evaluate their accident ratios, log violations and other criteria. The company, the drivers and the shippers should be liable for any violation. Drivers as well as the company should be responsible for cost relating to hours violations, as should shipper be responsible that intentionally overload equipment or demand service that causes violations.

I honestly believe that FWHA and the carriers and the carriers association should work together diligently to establish consentant procedures that are strong enough, but fair, to create safe highways for all involved.

We have to keep in mind that the greatest percentage of carriers work hard to run safe, legal operations. Therefore, let's concentrate on getting rid of the "bad apples" so that the industry safety record continues to improve as it has over the last ten years.

We should look to reward the carrier that sets an example and go up and above to operate safe operations.

I thank you for the opportunity to share my feelings. And if for any reason you would like to talk further, please feel free to contact me at your convenience.

Very truly yours,



Dennis Suelflow
Vice President
Barry Trucking, Inc.

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