



July 23, 1996

FHWA Docket No. MC-96-18
Federal Highway Administration
Office of the Chief Counsel
HCC - 10, Room 4232
400 7th ST, S.W.
Washington, DC 20590

QA-20602
FHWA-97-2299-20

96 JUL 23 8:37
LEGS./REGS. DIV.
FEDERAL HIGHWAY
ADMINISTRATION

Dear Madam/Sirs:

We have the following suggestion regarding Safety Ratings.

The current rating system, as it applies to a motor carrier's safety fitness, is inadequate. We feel the "Conditional" category should be eliminated. A motor carrier is either **SAFE** or **UNSAFE**. The current system rewards a motor carrier with an inadequate safety program by allowing them to operate on a conditional rating for an indefinite period of time.

All carriers should be rated by industry acceptable performance standards. These standards should include accident frequency, training procedures, driver qualifications and vehicle maintenance standards (including out of service rates).

Our accident history statistics indicate during periods of inferior driver qualifications and/or little or no ongoing training programs accident rates increase.

If you have any questions or would like more information please call me at 1-800-762-3776.

Sincerely,

Dennis Williams
Safety Director

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Interstate Truckload Carriers Conference

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LANA R. BATTS
President

TO: Board of Directors

FROM: Lana R. Batts

SUBJECT: Comments For Safety Rating Proposal

DATE: July 19, 1996

The due date for comments is July 29 -- just one week away. If we are to improve the process, we must have comments from every member of the Board telling FHWA just how concerned we are about the proposal and a need for change. If you haven't already sent comments, we've grouped the relevant issues into six categories to make it easier to select those issues of concern to your company. We know these are complex issues, but the industry's input into this rulemaking is critical if we are to persuade FHWA to make its safety rating process reflective of actual safety performance.

1. Safety Rating Categories:

- Should FHWA retain the existing safety rating categories of satisfactory, conditional, unsatisfactory, and unrated?
- Should the "conditional" category be eliminated? A survey of carriers indicates that the majority want to retain all but the "conditional" categories.
- How should non-rated carriers be categorized?

2. Basis of Safety Ratings:

- Should FHWA separate the rating procedure from the enforcement and compliance process, and if so, how?
- Should ratings be based solely upon accident ratios or other (specify) safety-related criteria?
- What weight should be given to the factors of driver qualification; operational factors (hours and false logs); vehicle maintenance; accident rates; general factors (financial responsibility and accident register); and hazardous materials?
- Should safety ratings account for operating exposure (e.g., mileage in congested areas)?

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