



COLORADO MOTOR CARRIERS ASSOCIATION

AN AFFILIATE OF THE AMERICAN TRUCKING ASSOCIATION, INC.

4060 ELATI STREET • DENVER, COLORADO 80216 • 303/433-3375 • FAX 303/437-6977

July 18, 1996

FHWA Docket # MC-96-18
HCC-10
Room 4232
400 7th St. SW
Washington, D.C. 20590

LEGS./REGS. DIV.

JUL 21 12:41

FEDERAL HIGHWAY
ADMINISTRATION

QA-20604
FHWA-97-2299-22

Dear Sir or Ms.:

We are writing in response to your request for comments on the proposed changes to the current safety rating system.

First, our association would like to note that it recognizes the need to continually review procedures and regulations toward eliminating unnecessary regulations and improving or streamlining others. Although we question certain aspects to the proposed changes to the safety rating system, we appreciate the efforts on the your part toward improving the current system.

First, we would like to state that the current system is in need of change. The current system is focused on measuring carrier compliance through an evaluation of paperwork and only places a limited amount of attention (16% of the overall rating) on performance and the carrier's accident rate. Thus the carrier rating and the system has a poor linkage to actual safety. We believe that greater weight should be placed on factors relating to the actual performance of the carrier and their accident history with less weight on the rating for paperwork violations which may be attributed merely to a driver's error in correctly recording his hours.

As to the actual rating scheme, we do not agree with the proposed system of only unsatisfactory and all others. We believe the scheme should continue to include a satisfactory rating. Many carriers have worked hard to attain and maintain a satisfactory rating and lumping them together with conditional and unrated carriers in a single category does not do them justice. In the case of the conditional category, we support the elimination of this category but only after a reasonable time period. This time period, which could be either six months or one year, would allow carriers in this category to work toward a satisfactory rating or face being dropped to unsatisfactory or unrated. Thus, after a one year transition period, our proposed rating system would have three categories, satisfactory, unsatisfactory, and unrated.

Our last comment relates to advance notification as to an unsatisfactory rating. We are very supportive of this concept but believe that 45 days is too short. We would suggest notification be made 60 to 90 days in advance of the rating. This would provide the carrier with a more reasonable amount of time to challenge the rating.

Thank you for the opportunity to comment on this important issue. Please contact me at (303) 433-3375, if you have any questions on this matter.

Sincerely,

Gregory D. Fulton
President

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