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FHWA-97-2299-31

July 26, 1996

FHWA Docket No. MC-96-18
Federal Highway Administration
Office of the Chief Counsel
IICC-10 Room 4232
400 Seventh St. S.W.
Washington, D.C. 20590

Dear Sir:

We have been audited and given a safety rating by the DOT. We've never been through an audit, and, of course, did not know what to expect. We received an "unsatisfactory rating" The two auditors, we felt treated us right and fairly. Our question is how is a rating determined. Is it a judgement call on the auditors part, are there guidelines to one of these three ratings.

We understood that we could get our act together, notify the DOT for another audit and after notifying them they had 30 days to return for a follow-up audit. We did notify and they never notified us or returned for another audit. We also understood that if they weren't notified they would return in six months for a re-audit. We did not hear from them in six months for a re-audit. After being persistent, which the auditors have commented on, they are finally coming back. How long would we have carried this unsatisfactory rating if I had not been persistent on a return audit?

We could go along with a "safety rating" and agree with the process if everyone had a rating that was in the trucking business. This is certainly not the case.

We have complied and worked hard to make our trucking business safer. We want to be in compliance, but we also think that all the other trucking companies should be in compliance, which we know they are not. We can't compete with the trucking companies that run the wheels off of their trucks and their drivers in the ground and are never audited. What about the truckers that only have one truck that they drive themselves- are they ever audited to see if they have physicals, correct logs and drug tests? No, and that is not fair.

Something is definitely wrong with a system like this. It's unfair- if one trucking company has a "safety rating" then they all should.

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We realize man-power is a problem with your department. Why not have the auditors go in for a "spot audit", if it looks bad then give the trucking company time to comply and then go in for a full audit. We have 7 trucks and 8 employees, the auditors were here for two days. Surely there would be a way to speed this process up. This is turn would get more companies audited.

A problem we also were very aware of, these auditors don't have any viable knowledge of the trucking industry. They can read their manual but this does not bring the real life trucking in perspective. One of the auditors that was here made the comment - "if the truckers would not trash around the truck stops they could get on down the road"!!! We took great offense to this comment. If a driver is trying to make a living driving a truck, there is really not much time to "trash around the truck-stops". A solution to this would be to let these auditors load up in a truck for about a week and see what the trucking business entails.

At this time, we are asking that there be changes made in the process of the "safety rating" system. If one company has one then the rest of the trucking companies have one also.

Thank you for your time.

Sincerely,



Phil Brewer



Karen Brewer

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