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FEDERAL HIGHWAY
ADMINISTRATION

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

Dear Sirs:

We would like to offer the following comments:

Accidents and Other Safety-Related Rating Factors

We have 26 separate fleets in our company. We have found no significant relationship between hours-of-service violations and frequency rates in those fleets. We measure both and compare on a regular basis. The purpose has been to determine if there is a significant relationship. To repeat, we found none.

Audits

Carriers should be selected for an audit based on serious accidents, out-of-service ratio at roadside inspections, audit history — not on employee complaints. Many times the complainants are those who were terminated or dismissed for safety violations. There should be an easier way to determine the legitimacy of a complaint. The carrier should have a chance to answer the complaint prior to assignment of a complete audit.

Should FHWA Establish an Educational Program to Help Carriers Improve their Operations to Improve their Rating?

Yes! The enforcement actions and rating a carrier "Unsatisfactory" should always be preceded by an educational program. If a carrier doesn't respond to these efforts, then proceed with the enforcement actions, and the assignment of an unsatisfactory rating.

Sincerely,

Don D Lacy
Don D. Lacy sf
Director of Safety

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