

Franks & Son

QA-20649

LESS THAN 5 D.V.

96 JUL 30 P 1 : 55

ADMINISTRATION

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7/22/96
FHWA DOCKET NO MC-96-18
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FHWA -97-2299-13

FHWA:

I AM WRITING ON BEHALF OF THE UPCOMING RULEMAKING SESSIONS WHICH INVOLVE MANY TOPICS NEAR AND DEAR TO MY HEART ABOUT TRUCKING.

OVER THE TEN (10) YEARS OF WORKING IN SAFETY, THE AMOUNT OF GRAY HAIR ON MY HEAD HAS INCREASED A TREMENDOUS AMOUNT. THE STRESS AND THE PRESSURE AT TIMES ARE MORE THAN ANY ONE INDIVIDUAL SHOULD HAVE TO TAKE. FRANKS & SON, INC. HAS ALWAYS WORKED VERY HARD TO KEEP IN COMPLIANCE WITH ALL RULES AND REGULATIONS. WE HAVE HAD AUDITS IN THE PAST, SOME DISCREPANCIES HAVE BEEN FOUND, BUT NOTHING ON A LARGE SCALE AND NOTHING THAT WE HAVEN'T CORRECTED. THE PROBLEM WITH THE CURRENT "RATING CATEGORY" IS THAT TOO MUCH EMPHASIS GOES INTO THE PAPERWORK WHICH IS MOSTLY RECEIVED FROM OTHERS. WITH OVER 100 DRIVERS, IT MAKES THINGS DIFFICULT TO MAKE SURE THAT EVERY T IS CROSSED AND I IS DOTTED, BUT WE TRY.

DOCKET mc-96-18-41
PAGE 1 OF 3

THE PRESSURE OF A SAFETY AUDIT IS BAD ENOUGH, BUT THE PRESSURE YOU MAY RECEIVE FROM THE OWNERS, BOARDS, ETC...IS ALSO WEIGHT UPON YOUR SHOULDERS. I BELIEVE THAT THE RATING SYSTEM SHOULD NOT BE BASED ENTIRELY ON THE "PAPERWORK" ITSELF. HAVE AUDITORS COME TO THE COMPANIES AND LOOK AROUND, STAY A FEW DAYS, TALK TO DRIVERS, SIT IN ON DISPATCH AND SAFETY MEETINGS, BASICALLY LISTEN TO WHAT PEOPLE HAVE TO SAY AND HOW WE THEY ARE SAYING IT. THAT IS THE "REAL RATING" OF A COMPANY ALONG WITH # OF ACCIDENTS, COMPLAINTS FILED, ETC... I WOULD LIKE TO THINK THAT MY SAFETY RATING IS BASED ON THE FACT THAT I RUN AN ALL-AROUND GOOD ORGANIZATION, YET ON EVERY AUDIT, MY DISPATCH/OPERATIONS HAS NEVER BEEN AUDITED. IT IS ALWAYS LOGS, DRIVER'S FILES, AND DRUG TESTING PROCEDURES.

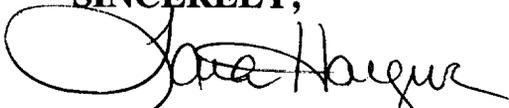
DRIVERS COME AND GO IN THIS INDUSTRY SO QUICKLY, THAT IT IS IMPOSSIBLE TO CATCH AND TRAIN THE DRIVER THAT MIGHT BE LOGGING IMPROPERLY. BY THE TIME THE LOG GETS IN AND RAN THROUGH YOUR COMPLETE LOG PROCESS, THAT DRIVER COULD BE GONE, LEAVING YOU WITH NO WAY TO CORRECT THE DRIVER OF HIS/HER ERRORS.

I WOULD LIKE TO SEE A "RATING SYSTEM" BASED ON THE OVERALL APPEARANCE, SAFETY RECORD, ON HANDS PROCEDURES INSTEAD OF THE PAPERWORK ONLY ERA. WE HAVE A LOT MORE TO OFFER THAN JUST LOGS AND FILES. I BELIEVE IT WOULD BE WORTH YOUR TIME. I AGREE WITH CATEGORIES OF SATISFACTORY & UNSATISFACTORY, BUT THE CONDITIONAL FALLS IN THE GRAY AREA WHICH LEADS CUSTOMERS TO THINK THAT YOUR ARE EITHER VERY CLOSE TO UNSATISFACTORY OR VERY CLOSE TO SATISFACTORY. MOST OF THE TIME, THE CUSTOMER WILL CHOSE THE FIRST ONE JUST TO BE ON THE SAFE SIDE. THIS TYPE RATING DOESN'T SAY ENOUGH ABOUT THE CARRIER AS A WHOLE.

DOCKET MC-96-18-41
PAGE 2 **OF** 3

THANKS FOR TAKING THE TIME TO LISTEN TO THE CARRIERS
POINT OF VIEW ON THIS TOPIC. THIS TOPIC CAN MAKE OR
BREAK A COMPANY, THEREFORE, I FEEL IT SHOULD BE
DEFINING THE WHOLE IMAGE OF THE COMPANY, NOT JUST
THEIR PAPERWORK.

SINCERELY,



TARA HARGROVE
SAFETY DIRECTOR

DOCKET mc-96-18-41
PAGE 3 OF 3



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FHWA:

THE TOPIC "DOT REPORTABLE" ACCIDENTS IS ONE THAT HAS BEEN CHANGED IN THE PAST DUE TO CHANGES IN THE TIMES, BUT I BELIEVE IT HAS REACHED ITS MAXIMUM CAPACITY WITH ITS CURRENT READING.

I UNDERSTAND THE PART OF THIS CATEGORY THAT TALKS OF RECEIVING A CITATION IN CONNECTION WITH THE ACCIDENT, BUT IT DOES NOT DEFINE CLEARLY IF IT MEANS ONLY YOUR DRIVER OR THE OTHER DRIVER. IT ALSO DOES NOT DEFINE THE TOWING PART OF THE SECTION EITHER. ALL INDIVIDUALS INVOLVED HAVE THE OPPORTUNITY TO HAVE THEIR VEHICLES TOWED. I KNOW OF OCCASIONS WHEN AN INDIVIDUAL WAS PICKED UP FROM THE SCENE BY A FRIEND, RELATIVE, ETC...AND HAD THE CAR TOWED, NOT BECAUSE OF DISABLING DAMAGE, BUT BECAUSE THEY ARE AFRAID SOMETHING MIGHT GO WRONG WITH THE CAR/VEHICLE. THE BEST EXAMPLE OF THIS WAS ONE THAT THE REPAIR OF THE CAR WAS UNDER \$250.00, BUT THE CAR WAS TOWED, NEVERTHELESS.

THE CURRENT REPORTABLE CLASSIFICATION NEEDS TO BE BETTER DEFINED, SUCH AS FATALITY IS DEFINED, IT IS VERY HARD TO MAKE A MISTAKE WITH THAT DEFINITION! I AGREE THAT MONEY AMOUNTS DON'T MEAN ANYTHING ANYMORE SINCE PARTS & LABOR ARE ON THE RISE, BUT THERE SHOULD BE A WAY FOR AN OFFICER AND A COMPANY TO DEFINE THESE QUICKLY WITHOUT ANY GUESSWORK.

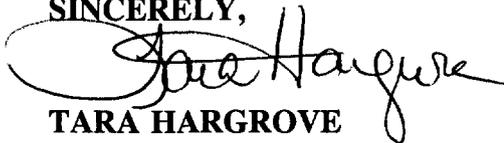
DOCKET mc-96-18-42
PAGE 1 OF 2

THE PROBLEM IS THAT PREVENTABLE AND NON-PREVENTABLE HAVE DIFFERENT DEFINITIONS IN PEOPLE'S MINDS. I REALIZE THE STATES ARE SENDING IN "REPORTABLE" REPORTS" TO THE FHWA. MAYBE THEY SHOULD HAVE A PIECE OF PAPER TO GIVE TO THE DRIVER TO GIVE TO THE COMPANY THAT STATES REPORTABLE OR NOT REPORTABLE. I HAVE SEEN SOME SIMILAR THINGS ON ACCIDENT REPORTS IN THE PAST. THE POLICE NOW GIVE SO LITTLE INFORMATION TO EACH INVOLVED, IT TAKES YOU DAYS OR EVEN WEEKS TO REACH THE RIGHT PRECINCT/OFFICE TO GET YOUR REPORT ORDERED AND THEY NEVER HAPPEN IN YOUR HOMETOWN. IT WOULD HELP THE COMPANIES IF THE OFFICERS WOULD TAKE A STAND ON OBVIOUS ACCIDENTS AT THE SCENE.

I AM STILL IN THE STATE OF MIND THAT MORE VEHICLE CARS CAUSE ACCIDENTS WHEN A TRACTOR-TRAILER IS INVOLVED BECAUSE "AMERICA" HAS NOT BEEN PROPERLY EDUCATED ON SHARING THE ROAD WITH EIGHTEEN WHEELERS. THIS IS SOMETHING I AM WORKING ON IN MY COMMUNITY SCHOOLS AS WE SPEAK. THE YOUNG DRIVERS OF TODAY HAVE MUCH FASTER CARS AND LESS FEAR OF THINGS IN LIFE THAN MANY OF US, THEREFORE, THE INCREASING NUMBER OF TRACTOR/TRAILER ACCIDENTS ARE NOT NECESSARILY THE CAUSE OF AN UNSAFE TRUCK DRIVER.

YOUR COMMENTS AND CONSIDERATIONS ARE VERY MUCH APPRECIATED.

SINCERELY,



TARA HARGROVE
SAFETY DIRECTOR

DOCKET MC-96-18-42
PAGE 2 OF 2