



MOTOR CARRIER COMPLIANCE SERVICE
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February 3, 1997

Docket Clerk
 Federal Highway Administration
 Department of Transportation, Room 4232
 400 Seventh Street, S. W.,
 Washington, DC 20590

QA - 21494
 FHWA - 97-2350-41

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 LEG S./REGS. DIV.
 FEDERAL HIGHWAY ADMINISTRATION

Subject: FHWA Docket # MC-96-28

Dear Sir,

I would like to register a comment pertaining to the current study on the hours of service as defined in Part 395. I am a consultant to the transportation industry, a retired State Police officer, and former Safety Director with a large motor carrier.

The most important issue is highway safety and keeping the tired driver off the highway. Under the current setup, the allowance of the split sleeper berth does allow a driver to maximize his/her miles and hours, if they pre-plan their trip(s). This, in many cases, is not what happens. Many drivers do not know how to adequately pre-plan their runs, or dispatchers, in many cases, take advantage of drivers. They rely on drivers to properly split their berth, so they will be "fresh" after a delivery and be ready to keep running. More often than not, this does not happen.

My recommendation would be:

For every twelve (12) hours driving, the driver must have eight (8) consecutive hours off-duty. Maintain the fifteen (15) hour rule. If the driver reaches the fifteen hour limit prior to his or her arriving at their maximum driving time, they must go off duty for at least eight hours. Allow meal breaks within the 15 hour limit to be "off-duty" if the driver can meet the current standard set by FHWA. After forty eight consecutive hours off-duty (at home terminal/base) the "clock" could be started at zero under the sixty/seventy hour rule.

Thank you for allowing comments in this matter.

Sincerely,

William F. Robinson, Sr.

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