

January 23, 1997

Carl W. Oeder Trucking, Inc.  
7370 Zear Rd.  
Maineville, OH 45039  
1-(513)899-8990

QA - 21497

FHWA 97-2350-44

Docket Clerk  
Attn: FHWA Docket #MC-96-28  
Federal Highway Administration  
Department of Transportation  
400 7th St. SW, Room 4232  
Washington, DC 20590

97 FEB 14 AIO: 25

LEGS./REGS. DIV.

FEDERAL HIGHWAY  
ADMINISTRATION

We are writing in regards to the current hours of service regulation. This company is a local dump truck service, our work is mainly seasonal and weather dictated. Under current law our drivers and brokers can only drive 10 hours and be in service only 12 hours total. While this restriction is hard on a company who has a mechanic to work on the trucks, the brokers and smaller companies do not have mechanics to fix flats and broken air lines, for example, they have to fix them themselves somewhere in the 12 hours or log the day. This is unreasonable, even simple maintenance becomes a problem under this law. Some drivers in smaller companies are required to do routine maintenance on the trucks.

We are asking you to reconsider the hours of service regulation. As in the case of a farmer at harvest season, we have to go while the weather is warm and sunny. Asphalt can not be laid in the winter due to cold temperatures, and can not be laid in the rain. All construction projects get behind schedule and asphalt companies just get trucks that work against regulations to replace us so they do not get fined for not completing their job on time. Dump trucking within a 50 air mile radius should have exemptions on driving times. We haul 7-10 loads a day. There is often a 10-15 min. delay at the plant and a 5-10 min. delay at the site. It takes between 30 to 45 mins from the time of the load to arrival at the job site. Between loads the drivers often get out and walk around thier trucks and talk to the other drivers. Some of our jobs are exempt (township, county, etc. roads) jobs and some are not. Some days we work both in 1 day. We can provide documentation for this if required.

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Large, non trucking companies often work their employees 12 or more hours. These employees also have to get on the roadways to drive to and from home.

In closing, for peak times in this industry so weather dictated, we request that you reconsider wisely and quickly the hours of service regulation.

Sincerely,

*Becky Ehling*

Becky Ehling  
Safety Manager

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