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Docket # MC-96-28

PI2: 59
Hours of Service
LESS./REGS. DIV.

P31
1 of 8 1995

Also to Chief Councils
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QA-2/479
FHWA-97-2350-30

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The Current Regulations are not doing the job. The Priority-which is to keep Sleepy Drivers Off the Roads! It does not matter if you drive for 2 hrs or 12 hrs, you can still be Sleepy if you haven't had proper sleep.

Drivers do other things in the course of the day besides driving. They use line 4 for on duty / but these companies want them to put the minimal time on line 4 even though the task takes longer; the rest of the time for that task is on line 1 off duty (which could be ^{for many} ~~longer~~). This gives the driver more time for driving but less for sleeping. It is a Bad Practice; but is used 'because' drivers only get paid for driving! Also line 1 off duty counts towards 'Resting' time so you can drive again. You can be doing anything while on off duty. As you can see the Log Book system as we know it, does not do what it's intended to do! Many say the log book system is too complicated (which it is!). Many Rules should be Relaxed. But many current Rules need to be strengthened!

→



problem: ↓

You can be off duty on time & doing anything / and also just simply relaxing; reading a book; etc. (Many are told by their ~~company~~ to use this while waiting for loading & unloading - this is wrong!) Even if you are relaxing you are still up.

The Human Body Remembers the last time it got any Restful & ^(Solid) Quality Sleeps, and if it is owed any sleep. It will do its thing --- Microsleep --- even at 60 MPH. This Cannot be Allowed. Nothing can take the place of (quality) → [Solid] Sleep, Nothing else works Music, Food, Peppilla, etc; Nothing can replace it!

Cot Naps 2 hrs here & there 'accumulated' are fine for 'extra' Sleep - But Do Not Truly Restore the Full Alertness needed to operate a Motor Vehicle - any type at all! this includes Cars too!

Unfortunately: since the Human Body works this way, the following has to be done to answer this serious problem. → Make it Mandatory to show a [Solid] 6 to 8 hrs of Unbroken Sleep ^(Quality) [line 2] - (Not accumulated) Sleep!) - for each 24hr Period! Unless the driver was Officially Off Duty for the entire Previous 24 hrs. → continued

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Note: → Anyone who thinks they can constantly forego solid sleep as previously mentioned; is putting their own Health at risk, in addition to endangering the Safety of themselves & others! (Pg 3)

→ continued → The Driver & His Company shall be held Accountable for Compliance & Monitoring of this requirement!

As a reward or compromise for the above mandatory requirement; perhaps Driving hours can be increased a little. →

Basically: Truck Drivers ^{should} be required to get a solid 6-8 hrs of 'unbroken' (Not accumulated) Sleep; each 24hr period. They can even drive up to 12 hrs a day; as long as they get the above Sleep Requirement. → 'Solid unbroken' Sleep is the only thing that can Restore Full Alertness!

Also they should be required to take a minimum of 30 mins Break after ^(every) 5-6 hrs of straight Driving! Nobody can maintain full attention to the Road, if Driving straight for 10 hrs or more, to do so without any break in the Driving, is totally unsafe!

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Note!

It is important to also recognize & require that companies consider the fact drivers as human & that sleep periods may vary greatly between different drivers! Times when they sleep
Companies should try to consider this when assigning loads!

Pg 4



Another Factor contributing to the Slappy Driver Problem is. LACK of Sufficient SPACE on Highway Rest Areas!

Too often & almost every Night ALL the Rest Areas become full (the same for Truck Stops which pull up much earlier)

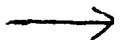
Drivers need to be able to get into Rest Area Spaces with out the tight Squeeze / nor should they be made to wander off the Highway to find Some other place.

LACK of Sufficient & Proper Rest Areas
IS AN ACCIDENT waiting to
HAPPEN!

Immediate Funding must be set up to expand & make additions to the Rest Area System! More Space is needed in there for the larger 53FT trailers; along with more parking spaces & Facilities Rest rooms Vending Phones etc.

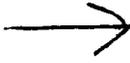
(Excellent)-
A Model example of this type of Rest Area can currently be found on Ky I-75 around milepost 177; near Rockwood, Ky.

More of these types are needed!!



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Talking about Sleepiness & Fatigue;
Take a look at this Serious Problem:



CARBON MONOXIDE & other Diesel Fumes

There are Thousands of Trucks on the road today with this problem! Be sure -
- the driver notices it - - it is really Bad.
When he tells his company about it, - they say they will check it out, unless a definite Broken pipe or Solid black smoke is coming out - no repairs are Made! But Fumes are still going into the Cab from other small minute cracks, Many Truck MFG Co's are told about this problem / they come back with some other excuse for it; or give you the Deaf Ear, No Repair to stop the problem for good are Done!

Legislation is needed for this Problem NOW!

find the cause of side effects...:

"One symptom of carbon monoxide poisoning is a sudden and uniquely strong urge to close the eyes. It is much different from fatigue. No amount of sleep or rest will remedy a leaky exhaust problem. We need carbon monoxide detectors in trucks to monitor for this otherwise undetectable poison.

It's a very Serious Health & Safety Hazard!

→ As you can see there are Problems here that are Related & Run ~~and~~ Parallel along with the Hours of Service! Things Need to be done to correct these. If laws need to be enacted or changed to accomplish this... so be it! It is in the interest of Everyone's Safety!!

There are also other things that need to be addressed which effects the Safety for all; such as certain problems on the US Interstate Highway Systems / along with lack of enforcement of the Basic Driving Rules! (eg: Many cars never use Turn Signals or Yield at ON Ramps, - making it Dangerous for a large Semi / 80 thousand pounds going 60 MPH to have to move over on a Slack Roadway / there may not even be any room to move over because of other vehicles in the next lane! Still the cars / Picking Trucks / coming in on the ON Ramps do not care or even look - they just shoot right on regardless!

IN FACT
Most ON
RAMPS
DO NOT
HAVE Yield
Signs.
They Should!!

This is just one MAJOR problem here; there is not enough time here to cover other things.

But additional Comments are needed so your Department can look at those problems too!

→ It should be known that many drivers, especially Company Drivers have no one to turn to with Problems, such as all the foregoing mentioned here. Most Companies Drivers work for, give a Leaf Car & are too busy worrying about their loads & customers. There are other organizations & associations too; but many of them have Special interests; such as to the owner-operator truckers/ who have some quite a different view - since they are Driven for Profit only!

There are many wrong things going on out there, talking about them is fine. But laws are needed to help actually fix most of these Problems, it is in everyone's interest & Safety Too!

Please note I am not a member of any Special group or Safety organization. I am just a OTR Driver seeing what actually goes on, out here Every Day!

Your Help is desperately needed to correct some of these Problems; Thank you.

My # VM# (716) 234 6164 DOCKET MC 96-28-87