

MC-96-28

Jan 11, 1997

Dear Sirs

I read in Truckers News that we could send our thoughts and comments to you about HOS, so here are mine.

I ~~we~~ feel it would work better if instead of 70 hours in 8 days if it was something simple. Plus what works for single drivers is not good for teams. Following is a example of what I feel would work for both and drivers would be satisfied with.

Teams

10 on 2 off each

Both	2 hrs eat + shower	} #2 8hrs sleeping
#1	1/4 VI and 5 hrs driving	
#1	1/2 hr. Break	
#1	4 3/4 hrs. driving	} #1 8hrs sleeping
Both	1 hr. eat	
#2	1/4 VI and 5 hrs. driving	
#2	1/2 hr. Break	
#2	4 3/4 hr driving	
<hr/>		
24 hrs.		

Single

12 on 12 off

2 hours eat + shower	} #2 8hrs sleeping
1/4 VI and 6 hrs driving	
1/2 hr. Break	
5 3/4 hr driving	} #1 8hrs sleeping
1 1/2 hours eat + relax	
8 hours sleep	
<hr/>	
24 hours.	

LEGS/TEGS DIV.

37 JAN 3 AM: 11

ADMINISTRATION

BOOKET

MC-96-28-86

PAGE

1 OF 3

The above is to show how it could work where the drivers could have time to eat, relax, get enough sleep and have enough hours to drive to get their loads delivered when the receiver wants them. The way it is now you can't even have 15 hrs. on duty a day or you'd be out of hours, because that would be 86 hrs in 8 days. Plus what you did 7 days ago has nothing to do with how you feel today.

The normal adult does not need more than 8 hours of sleep a day. Most the more they sleep the tired they feel.

QA-21486

FHWA-97-2350-36

The way the HOS is now you can drive only 8 $\frac{1}{2}$  hrs. 15 min VI per day in 8 days to have 70 hours. That gives the driver 15 $\frac{3}{4}$  hours to do what?

I do believe there should be some regulations put on receivers and shippers. The driver should not have to sit and listen to a CB for several hours waiting for them to tell him when to back in (he should be resting) (and when he gets the load there he should not have to spend 2 to 6 hours unloading the truck himself or paying a lumper \$100.00 (tax free) to do it. The goods belong to the receiver he should be the one to get it off the truck. The driver should only have to get the load to their dock. while they unloaded, the truck the driver could get his rest.

There are more teams on the road today and the HOS are not set up for them. My husband and I try to drive 10 hours each with 2-15 min VI a day and it works real good. We each get 8 hrs of sleep and have time to eat. But if we do this every day for a week we are out of hours. When I was home I would work 8 hrs (for pay) - 1 hr driving to and from work and cook-clean-wash clothes and ect. for 8 hrs and sleep for 6 hrs and felt great. Now I'm told I have to sleep 8 hrs a day or I can't do my job.

Plus another regulation I've found I feel is wrong if you are in the passenger seat you have to be logged on duty. When I get up and my husband is still driving I like to sit up and look at the sights, read or take pictures, things I can not do in the sleeper. so if I relaxing and enjoying the sights why do I have to be logged on duty because I'm not on duty. This should be changed.

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Before making the new or changing the regulations I feel the people doing it would do a better job if they got a 1<sup>st</sup> ~~hand~~ hand experience for a month at Trucking and hauling produce. See what we go through and what we do then you would better know what needs to be done.

I hope you will take what we say into consideration as we know what we do - what we can do and what we don't do that we get blamed for we truck drivers can tell you more than some one that sits in a office and thinks he knows what we do,

Thank you for your time

Sharon Johnson - truck driver  
Box 68  
Centralia KS 66615

FEDERAL HIGHWAY  
ADMINISTRATION

*FEB*  
7 ~~JAN~~ 3 P1:32

LEGS./REGS. DIV.

Henry Winter  
R. R. 1, Box 108A  
Edwardsport, IN 47528  
January 21, 1997

Docket Clerk  
Attention FHWA Do&et #MC-96-28  
Federal Highway Administration  
Dept. of Transportaton, Room 4232  
400 7th Street SW  
Washington, DC 20590

Dear Sir:

In regards to an article in the December issue of the TRUCKERS NEWS. An article entitled "Hours-of-Service Begins Transition".

In response to some of your questions:

I think the maximum driving time should be twelve hours. There should be a maximum of five hours on-duty time, The driver should be allowed to decide.

Non-driving time should be counted differently than driving time.

I also think rest breaks of 8 to 10 hours should be mandatory during long driving periods.

A driver should be paid miles, hours and loading or unloading time. No driver should have to load or unload anything. Shippers should load and count, consignee unload and count, No "lumpers" should be required. This should include all drivers.

Yours,  
Henry Winter

R. R. 1, Box 108A  
Edwardsport, IN 47528

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*87*  
*mc-96-28-~~18~~*

*1* OF *2*

P.M. 2/3/97

Jeana Green  
2710 Hutcheson Rd.  
Benton, AR 72015



RE: HOURS OF SERVICE

MC-96-28

37 FEB 6

1. What consequences, if any, should be imposed upon a shipper or consignee if a driver violates the Hours of Service (HOS) requirements due to the actions or demands of the shipper or consignee?

Shipper &/or consignee should be forced to load/unload trailer in a timely manner with their personnel. A ~~detention~~ detention fine does not work as most trucking co. are not willing to charge and those that do do not give compensation for the driver. A 2-4 hour wait to start load/unload (or move) and hours for loading/unloading are not acceptable. Many drivers are forced to sit in break room instead of being able to sleep or are forced to stay on docks and count the product as it is being loaded.

2. How should the loading and unloading of freight, lumpy, and engaging in activities other than driving be addressed. Please provide data that supports your answer.

#1 in California workman's comp claims are truck drivers. Drivers are that-trained professionals (who are hired to drive over 100,000 miles a year) who's job it is to do pickup and deliver a product on time, safely, without damage to the product.

The "lumpy" business is an industry that is a

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Primarily cash business that "rips-off" the IRS by millions each year.

McCrane Foods - Temple, TX - cash only using their own employees

Walmart Supercenters charge up to \$110 to unload - using their own employees

Many produce markets charge a gate fee! When the Driver is forced to add use their money at their fee.

Many trucking co's "rip-off" Drivers as the cost for loading/unloading is included in the bill but the Driver doesn't get the full cost.

Ex: Kimberly Clark adds \$120 for unloading - some co. will only pay Driver \$30 - \$90 profit 120 to unload / get Driver only allowed \$70

Example profit is but the Driver - the shipper / consignee has the profits loaded/unloaded to their specs w/o having to pay wages, freight, dock time

cost, etc; the Trucking co. makes a small profit; The loader/unloader makes tax-free money

The Driver is either forced to load/unload product he did not order and will not pay for or forced to use a loader who will do his best to get the highest price: ex: 80 = 70-100<sup>00</sup>

(Also nice to make 35-50/hr tax free)

(3)

3. Should the FHWA seek legislation from Congress to regulate shippers and consignees to prohibit them from making demands on a motor carrier and its drivers that would cause a violation of the H.O.S. Rules? Why?

1. Most drivers do not get (are not forced to be) paid for sitting at docks. They only get paid for the household (not) miles for the trip. If a driver really put down all the hours they sit - it would greatly reduce the miles he could drive and the ways he could make

2. The carrier and the driver did not order the product - they were hired to ~~carry~~ transport it from point A to B

3. Why should carriers and drivers spare shippers/consignees money (wages, fuel, taxes, workman's comp) when they may jeopardize their own profit by delay and possible injury or accident?

4. Again, the driver is hired and required to drive professionally and to deliver on time without damage to product - they should not be responsible for loads/unloads or forced to ~~let~~ permit undue delays:

ex: WAL-MART Brookhaven, MS  
arrive 1445 and dock

1445 called to dock area  
1710 finished driver unload (B98 pieces)  
driver got \$35, ~~but would be~~ (and had to be) again

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would be paid \$70 forumper

\*1. What is your age?

30 or younger.....	21	4%
31-50.....	293	54%
51-65.....	202	37%
66+.....	26	5%
No answer.....	1	0%

2. How many years have you driven?

3 years or less.....	17	3%
4-10 years.....	78	14%
11-20 years.....	185	34%
21+ years.....	259	48%
No answer.....	4	1%

3. Which type trucking operation are you in?

Leased to carrier.....	415	76%
Exempt carrier.....	31	6%
Authorized carrier.....	88	16%
No answer.....	10	2%

4. Are your driving assignments:

Mostly long-haul.....	341	63%
Mostly short-haul.....	72	13%
Some of each.....	109	20%
Other.....	17	3%
No answer.....	4	1%

5. Are your usual driving hours:

Mostly daytime.....	99	18%
Mostly nighttime.....	39	7%
Rotating shifts.....	29	5%
Some of each.....	376	69%
No answer.....	0	0%

6. Caffeine is useful in keeping you alert:

Any time.....	32	6%
Used sparingly.....	342	63%
Used repeatedly.....	48	9%
Has no bad side effects.....	68	13%
No answer.....	53	10%

7. To drive safe and alert, most people need to sleep about:

9 hours +.....	12	2%
7-8 hours.....	328	60%
5-6 hours.....	185	34%
Less than 5 hours.....	11	2%
No answer.....	7	1%

8. Drowsiness or fatigue can affect a driver's:

Alertness/reaction time.....	22	4%
Ability to concentrate.....	4	1%
Judgment /decision making.....	7	1%
All the above.....	507	93%
No answer.....	3	1%

9. When a person hasn't had enough sleep, the unfavorable effects on performance can be fully overcome by:

Walking around, fresh air.....	18	3%
Taking short nap.....	11	20%
Getting adequate sleep.....	397	73%
Using coffee or stimulants.....	7	1%
No answer.....	10	2%

10. For health and safety, it is best to schedule driving hours so that sleep can be:

In one 7-8 hr period.....	417	77%
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Divided into 3-4 hr blocks.....	83	15%
When too tired to drive.....	22	4%
As short as possible.....	10	2%
No answer.....	11	2%

11. Sleep apnea is a disorder in which you:

Have muscle twitches.....	8	1%
Cannot fall asleep.....	48	9%
Stop breathing/awakens.....	373	69%
Wake/can't go back to sleep.....	33	6%
No answer.....	81	15%

12. Because of our Circadian rhythms, in mid-afternoon and a few hours after midnight: (Mark all that apply)

Depressed mood.....	134	25%
Mental alertness increased.....	27	5%
Our performance is sluggish.....	360	66%
Feel drowsy & want sleep.....	467	67%

13. Effective ways to avoid driving tired are: (Mark all that apply)

Sleep when body is ready.....	489	90%
Take naps at the right times.....	347	64%
Educate family on sleep.....	222	41%
Ensuring room comfort.....	318	59%

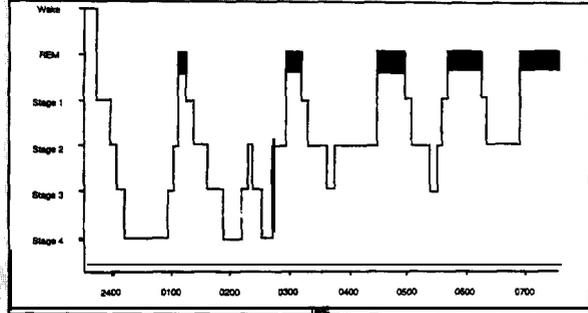
14. If a driver gets only 3 or 4 hours of sleep some work nights it's not a problem because he or she can make up the sleep on the weekend or days off.

True.....	43	8%
False.....	494	91%
No answer.....	5	1%

\*First half of the questions and raw response data.

Let's say a driver who needs eight hours of sleep a night only gets six hours of sleep per night for five days while he's out on a trip. He's accumulated a sleep debt of 10 hours. Sleep debt is only erased by getting extra sleep tacked onto the sleep you would regularly require to be alert. An accumulated sleep debt of 10 hours would not require 18 straight hours of sleep, but it would probably require the regular eight hours, plus three or four extra hours to return to equilibrium.

Another item that was answered along lines of what actually happens versus what is best for drivers, was the 15 percent that answered that sleep divided into three to four-hour blocks was best. That's what happens in the sleeper berth, but that is not what is best for the driver's health or safety. Sleep is not a constant state that remains static throughout a night's sleep. Sleep research has identified five separate and distinct sleep brain wave patterns that occur in a specific order during a normal night's sleep.



Histogram of Normal Sleep

Sleep early in the night reaches sustained levels needed for physical rejuvenation. Sleep later in the night tends to be lighter and contains most of the rapid eye movement (REM) sleep, or dream sleep, which is responsible for mental recharging. If a driver sleeps in three to four-hour blocks, he is effectively cutting out normal REM sleep. Since the mind needs REM activity, it will begin disturbing the deep sleep at the beginning of the sleep cycle, and this in turn will make the person "body tired."

Another question that shows the need for more information was #11. Fifteen percent of respondents

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PAGE 4

continued on page 57



# high performance diesels

Bruce C. Mallinson

## How to build a high performance Cummins diesel

By request of our readers, we are beginning the new year with a recap on the major components needed to build a high performance Cummins diesel engine. During the past year we have answered many questions on the subject of horsepower and torque. If you missed a segment and would like us to send you a copy, call me at the phone number listed at the bottom of this column.

1. **Turbo:** It takes a lot of manifold pressure or turbo boost to bum the additional fuel necessary to make horsepower. If you don't have boost, you won't have power. The horsepower is produced by burning the fuel. The turbocharger supplies the necessary air to complete the bum and keep the exhaust temperature down.

2. **Injectors:** Stock flow injectors

are very limited on the amount of fuel they will inject into the combustion chamber. This is where the power comes from, the injection of fuel. The more you inject, the more horsepower and torque your engine will produce. Stock injectors are very hard on camshafts when the fuel pressure has been increased. Always install the next size larger injector if you want power.

3. **Fuel Pumps:** Now that the injectors are larger the fuel pump has to deliver more volume and pressure. You have to have a high output pump for performance.

4. **Pistons:** When performance increases the internal pressure on the piston also increases. This is why we have our pistons ceramic-coated on the top and Teflon coated on the sides.

5. **Timing:** Retarded timing will

also enable your pistons to live longer. Do not advance timing in a Cummins engine.

6. **Fuel Suction Line:** Install #12 line and fittings from the tank to the pump.

7. **Air Filters:** Two are much better than one. Freightliners with one filter under the hood are very restrictive -but we do have an economical solution for this.

8. **Dual Exhaust Runs 50** degrees cooler on exhaust temperature than single exhaust. A

*If you would like to receive a copy of a previous article or a book (designed for owner-operators) with more information, please call (412) 274-4080 or write: Diesel Injection/Marmor of Pittsburgh Bruce Mallinson, 1403 Freeport Road, Box 82, Cheswick, PA 15024.*

### news

#### Most carriers should need no assistance in claiming state tax refunds in Kentucky, Ohio

Refund programs are underway in Kentucky (DVO Vehicle Identification Card and Supplemental Highway Use tax) and are soon to be started in Alabama (\$12 fuel decal fee). As with previous refund programs (Massachusetts, Mississippi, Pennsylvania, etc.) carriers eligible for refunds will be automatically contacted and provided all necessary claim forms.

Carriers should be wary of advertising and law firms advertising for paid refund assistance. By now, most carriers should be quite accustomed to the refund procedures and should have little difficulty in completing the claim process on their own.

Carriers should be given an ample opportunity to express concerns, fears — at least 90 days before refund and claims much longer. If the courts allow extensions for they have in similar cases of the refund claim period.

If more assistance is needed, carriers may call the American Trucking Association's (ATA) Litigation Dept. at (703) 261-2000. They were appointed by the court in last month to assist in refund administration. Or contact law firm of Collier, Shattuck, & Associates, P.C. (attorneys for the court in the Alabama litigation).

January 27, 1997

KJM Trucking  
7037 Goshen Road  
Goshen, Ohio 45122

97 FEB 6 P 1:38  
LEGS./REGS. DIV.

ADMINISTRATION

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

I am writing in regards to the current hours of service regulation. **I am a small** company with **1** dump truck. The work is seasonal and weather dictated. Under current law my driver can only drive **10** hours and be in service only **12** hours total. This restriction is hard on a company who has a mechanic to work on trucks, but more so on **my** company, because the driver makes the repairs, such as flats, broken air lines, etc. and they have to fix them somewhere in the 12 hours or log the day. This is unreasonable, even simple maintenance becomes a problem under this law.

**I am** asking you to reconsider the hours of service regulation. Asphalt can not be laid in winter due to cold temperatures and can not be laid in the rain. All construction projects get behind schedule and asphalt compaines just get trucks that work against regulations to replace us so they do not get fined for not completing their jobs on time. Dump trucking within a 50 air mile raduis should have exemptions on driving times. My truck **my** haul 7-10 loads a day. There is often a 10-15 minute delay at the plant (maybe longer if the plant is down) a **5-10** minute delay at the job site. It takes between 30-45 minutes from the time of load to arrival at the job site. Between loads the drivers are often out of their trucks walking around and talking to the other drivers. Some of the jobs are exempt (township, county roads) jobs and some are not. Some days the truck works both in one day.

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Large non-trucking companies often work their employees 12 or more hours and these employees still have to get into their cars and drive to and from work.

In closing I request that you reconsider wisely and quickly the hours of service regulations for peak times in this industry that is dictated by the weather

Sincerely



KJM Trucking  
Karen McCain  
Owner

DOCKET MC-96-28-89  
PAGE 2 OF 2

Docket Clerk Attention  
FHWA Docket # MC-96-28  
Federal Highway Administration  
Dept of Transportation Room 4232  
400 7th St. SW  
Washington D.C. 20590  
TO whom it may concern,

P.M. 2/3/97

ADMINISTRATION

97 FEB '6 PI: 38

I am writing ~~REGS. DIV.~~ an article in the January 1997 'Trucker News'.

I believe the current hours of service are not so far outdated. Back in the beginning of log books, trucks did not haul as much and were not capable of the speeds of today. Trucks are more productive and efficient. Trucks are constantly improving driver comfort to reduce stress and fatigue which increases productivity.

Under 70 hour maximum hours of service, a driver can burn up this time in as short a time as 4 1/2 days. Now you have a driver & a truck tied up for 2 1/2 days before he can be productive again. After sitting around for 2 1/2 days I am more tired than if I just took 24 hours off and went back to work. Not all drivers work that hard, relax. I am comfortable with a 10 hour drive time per day, but sometimes I need a little more to keep bill collectors away from my door, and also to provide service to customers. If you can't keep a good customer happy he will go somewhere else. Customers are what pay the bills and my TAXES!!!

If any changes are to be made in current hours of service, I would be for running up to maximum hours of service and taking 24 hours off when I hit the clock allow, again. It would maximize equipment usage and take away some of the driver shortage burden.

I have ideas and ideas to solve problems of you.

DOCKET MC-96-28-90

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want to hear them. I am quite sincere about  
any problems or questions you may have about insurance,  
the trucking industry and its image.

Stanley C Marsh  
Leased owner operator to  
BTF Special commodities

My address  
PO Box 98  
Earlham, Iowa 50072.

P.S. I am sorry, but I didn't have a typewriter at  
the time I wrote this. I hope you will excuse the  
handwriting.

mc-96-28  
97 FEB 6 P 1:38  
ADMINISTRATION  
LEGS./REGS. DIV.

01/ 27/ 97

Dear F.H.W.A.,

As the mother of three teenagers, I can understand your concerns for keeping the roads safe. However as the wife of a Truck Driver I am also concerned over the new proposal for a 12 on 12 off rule. This is going too far. No one needs 12 hours of sleep. The only thing that will come out of this is higher prices for food, clothing, everything!

I have gone on long trips with my husband and the only danger on the roads that I have seen is from drivers of cars that deliberately go out of their way to cause problems for trucks.

This is no easy job, lets not make it any harder for these hard working men and women. The existing rule of work 15 drive 10 is just fine the way it is. Leave well enough alone.

My children and I see little enough of their Dad. We don't want him sitting somewhere for 12 hours when he could be home with us.

REMEMBER TRUCKS KEEP AMERICA MOVING!

Sincerely,  
*Victoria Collins*  
Victoria Collins  
3 Nora Rd.  
Merrimack, NH 03054

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PAGE 1 OF 1



#1

#33. What consequences, if any, should be imposed upon a shipper or consignee if a driver violates the Hours of Service (HOS) requirements due to the actions or demands of the shipper or consignee?

ANSWER #33:

A fine on the Co. should be reported to the proper authorities —

LEOS/REG. DIV.

97 FEB 6

: 38

ADMINISTRATIVE

#34. How should the loading and unloading of freight, lumping, and engaging in activities other than driving be addressed?

ANSWER #34 = The people or company receiving the freight, should be responsible for all unloading + re-loading. The driver needs his "rest"

#35 = How should situations where drivers encounter delays at shippers or consignees be considered in the proposal?

ANSWER #35 = The driver should be in his or her sleep, as I say the driver needs his or her rest, or give them more hrs. to drive —

#2

#36 =

Should the F.H.W.A. seek legislation from Congress to regulate shippers and consignees to prohibit them from making demands on a motor carrier and its driver that would cause a violation of the H.O.S. rules? Why?

Answer #36 =

Yes, very much so -

So the driver won't waste his H.O.S.

MAY God Bless:

Eldred A. Maxwell

Respect:

EAM Maxwell  
603 E. Young St.  
New Iberia, La.

7560

LOUISIANA CDL # 002008016

PH # 318-367-0047

mc 96-2892

January 30, 1997

Docket Clerk,  
Attention FHWA Docket #MC-96-28  
Federal Highway Administration  
Room 4232  
400 7<sup>th</sup> Street SW  
Washington, DC 20590

97 FEB 7 8:07  
ADMINISTRATION  
LEGS./REGS. DIV.

Dear FHWA:

The current system of logging hours of service needs to be replaced with a mechanism for recording actual driving time and new technology to monitor mental alertness. On duty not driving time should not be counted against hours of service, though it could still be logged as important information for further regulatory action.

From the perspective of drivers, the essential problem is that in fact they are on duty for untold hours of uncompensated work time. This uncompensated work time is seldom if ever logged because that would reduce time available for driving, and driving time is the only work time effectively and fairly compensated.

If on duty not driving time was accurately logged according to DOT instructions, as well as according to actual hours worked, there would generally not be enough driving hours available to make a living as an over the road truck driver. That OTR drivers put in so many uncompensated on duty hours is a serious issue in terms of safety, justice, and constitutional rights.

LTL carriers who pay hourly wages have a huge incentive to ensure the most efficient use of a driver's work time. Long-haul carriers have little incentive to do the same. If an OTR driver sits and waits five hours before receiving a load assignment, the carrier does not have to compensate him for those five hours. When that driver reaches the shipper and waits three hours before even getting into a door, the carrier does not have to compensate him for that time either. And when the loading and paperwork takes an additional two hours, the carrier again does not give the driver a penny for what clearly amounts to on-duty time.

So that after ten hours of uncompensated and unlogged on duty time and perhaps two hours of actual driving time, the OTR driver sees one full working day gone by and maybe \$30 earned. But if he can get in ten good hours of driving the next day maybe things will start to even out. So he says to himself.

The next morning he pretrips his rig and finds a flat tire on the trailer. With 77,000 GVW he is in violation of legal weight limits unless the tire is fixed. So the next 30 minutes are spent contacting the breakdown department and making arrangements for the needed repair. Another three hours are spent driving to the approved shop, which happens to be in the opposite direction of the receiver, and getting the tire replaced. Finally, about noon, the driver gets started on his run - sans a shower or decent meal, neither of which he now feels he has time for. And meanwhile, he has been on duty all morning and again with absolutely no compensation. So a second day he drives until midnight or so.

The following day, an hour from the receiver the driver encounters a "parking lot" traffic jam with vehicles backed up five miles on the only approved or possible route. He misses his appointment and is told he now cannot be unloaded until early the next morning. But since it is not a 24 hour period he does not even merit layover time.

Finally, the next morning he backs into a door and is unloaded in 20 minutes. With high hopes he contacts his dispatcher and anxiously awaits a new assignment. But the delays have

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made it difficult to preplan a new load for him, so that even as he waits there at the receiver not daring even to head to the closest truckstop lest it be in the wrong direction, the company is unable to find a good load for him until 1 p.m. And the cycle continues.

When are we "on duty" as OTR drivers? In reality, we are on duty during any time we are in or near our truck, waiting for a load, waiting for a door, waiting to be unloaded, waiting for repairs, waiting for scheduled maintenance, waiting to be inspected, checking maps, calling the company, calling the shipper, calling the receiver, waiting for an available phone, and, ultimately, "babysitting" the company equipment and the load we are personally responsible for. But since all this on duty time does not move our rig one mile, we do not receive one penny compensation for it. That, friends, is the real problem.

Several blue sky solutions come to mind:

- a) Put drivers on a salaried basis, with minimum performance standards and appropriate bonuses for exceptional performance;
- b) Mandate at least minimum wage compensation for all on duty work time;
- c) Grant company drivers the status of owner operators and give all drivers the secured power to negotiate compensation for every load.

At least this fundamental oroblem needs to be addressed in your current review of HOS.

Long haul over the road truck drivers wish only to be fairly compensated for their work, and to not be forced to work continuously overtime in order to make up for their untold hours of uncompensated on duty time. In a recent month I received five layover days and waited over 34 hours just to receive load assignments. To make up for all those hours when I was effectively "on duty" and in the active employ of my company, and yet not truly free to go and do as I please, I did not ask for nor did I receive any official off duty break time. So that in effect I was on duty every day of the month, although I was compensated as if I had worked maybe 23 or 24 of the 31 total, Not a good way to live. Counting all real on duty hours, I doubt I made the minimum wage.

A final note on my background. I have driven now three years but it is a temporary job as I ponder and prepare for future alternatives. I have two advanced degrees and may return for a doctorate. I enjoy driving over the road but I can easily understand why the huge turnover. The sitting and waiting and working for nothing finally starts getting to you. Solve that problem and then OTR drivers just might get fair compensation for their actual work time. That, in turn, would go a long way toward resolving the issue of fatigue and HOS.

If the review process provides for any direct participation by professional truck drivers I would be interested. I might even be open to a position at the federal or state level, as I would bring a unique set of gifts and experiences.

Sincerely,



Rich Koster  
P.O. Box 413  
Bridgewater, Va 22812

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PAGE 2 OF 2

ADMINISTRATION

3777 7 08:07

LEGS/REGS. DIV.



I am a very concerned truck driver who would like to know, will this revising of hours of service have any affect on the oil field industry drivers? and if so, how?

Otis Weber  
2001 Palm Village Blvd  
Apt. 539  
Bay City, TX 77414

Otis Weber  
Otis Weber  
Bay City, TX



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