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**DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**

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September 6, 2002

File No.: 1.009819.A12626.062.2-1538.

U. S. Department of Transportation  
Dockets Management Facility, Room PL-401  
400 Seventh Street, SW  
Washington, DC 20590

Re: FHWA Docket-2001-10370 - 4

The California Highway Patrol's (CHP) primary focus in evaluating this Notice of Proposed Rulemaking is to determine if it would be likely to improve the safety performance of motor carriers operating on California's highways. The CHP has primary jurisdiction over enforcement of motor carrier safety issues in the State of California and is concerned with carriers entering the state from foreign jurisdictions and the potential negative impact on highway safety, without appropriate oversight.

The CHP does not oppose the concept of the Federal Highway Administration's (FHWA) proposal to increase the distance that width exclusive devices could project from the side of a commercial vehicle (CV) or re-classifying a recreational vehicle. The CHP does have some concerns in regard to the width extension on non-property carrying devices that should be addressed prior to the implementation of the change.

- California statute currently limits the width of these devices to three inches on each side.
- California has thousands of miles of narrow, winding roadways. Continuing to increase the width of CVs will eventually cause safety concerns.

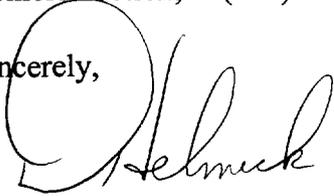
The CHP does not oppose the concept of the FHWA proposal to classify a recreational vehicle as a non-commercial vehicle when being moved to the point of customer delivery, e.g., from a manufacturing location to a dealer, or between a dealer and a tradeshow, as this is in line with California statute.

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Thank you for the opportunity to respond to FHWA Docket 2001-10370. If you have any questions, please feel free to contact Captain Andrew Jones, commander of our Commercial Vehicle Section, at (916) 445-1865.

Sincerely,

A handwritten signature in black ink, appearing to read "D. O. Helmick". The signature is written in a cursive style with a large, prominent initial "D".

D. O. HELMICK  
Commissioner