

E&T Trucking, Inc.
1201 S McClure St.
Marion, IN 46953

DEPT. OF TRANSPORTATION
DOCKET SECTION

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June 11, 1998

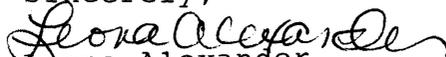
FHWA - Attn: Docket Clerk
U.S. DOT Dockets Room PL-401
400 Seventh Street SW
Washington, DC 20590-0001

RE: Docket No. FHWA-98-3706-1b

To Whom It May Concern,

My name is Leona Alexander, I am the safety department of E&T Trucking. We are located in Marion, IN. We operate 16 **power units. We also lease 4 other units complete with drivers.** We have been "Inc" since 1991. I am writing in response to the proposed rulemaking on the Hours of Service of Drivers as it relates to supporting documents. First of all, I would like it to be noted that our company is very committed to highway safety. Any out of service violations are dealt with promptly to avoid a repeat of that situation. We do not have many out of service violations and we plan to maintain that record. DOT inspections, whether roadside or in the office, are a necessary part of our business. We accept this. What is hard to accept is rule changing, especially when it is not clearly defined what the changes are. Clarity is needed at this point. 'We have had 3 DOT office inspections. Our first was in Dec., 1995. The conditional rating we received was not acceptable to the president of our company, so I was hired to correct the 'wrongs' which was hours of service. Now we have a safety department, Me! Our rules were changed, and the drivers were made aware of the new rules. In May of 1996 a new audit was requested by our company. After this audit we were awarded our new rating of Satisfactory. With a clear and concise set of rules our drivers were able to do what was expected of them. Most motor carriers are the same way. If you give us rules or guidelines, we will do what is required. Compliance is the issue here, and we all want to do our part. A program with clear guides on what is acceptable and what is not is needed in this situation. In our third audit the auditor put **my** program and rules to the ultimate test. This man was 'out for blood'. He threw curve balls and requested things that were not even mentioned in our previous audits. At one point, this man actually said to me, "I do not believe you, prove it". I did the only thing possible when confronted with such a challenge. I proved it. Surprisingly after such an audit, we still have our Satisfactory rating. I am very proud of it. My suggestion is to give us some guidelines. Let us know what is expected, then we will work out programs to meet these requirements. I agree that every company should have a program to ensure compliance with hours of service rules. Simplify, and give us some guidelines. Then set back and watch the programs fly.

Sincerely,


Leona Alexander