



DEPARTMENT OF TRANSPORTATION

Mobile Communication & Information Systems ⁹⁸ JUN 18 AM 9:32

DOCKET SECTION

June 17, 1998

Docket Clerk
DOT Dockets, Room PL-40 1
400 Seventh Street, SW
Washington, D.C. 20590-0001

FHWA-98-3706-17

RE: Highway Master Corporation's Comments on Notice of Proposed Rulemaking, 63 Fed. Reg. 19457 (April 20, 1998) issued by the Federal Highway Administration ("FHWA") Docket No. FHWA-98-3706; Hours of Service of Drivers; Supporting Documents

Dear Sir or Madam:

HighwayMaster Corporation submits the following comments on the above-referenced notice of proposed rulemaking. HighwayMaster Corporation has reviewed the Comments of QUALCOMM Incorporated filed in the above-referenced Docket No. FHWA-98-3706 and generally concurs with the position advocated by Qualcomm therein.

Specifically, HighwayMaster agrees with QUALCOMM that the proposed 49 CFR 395.2 definition for supporting documents may act as a disincentive to motor carriers to make the investment in advanced technology systems. Accordingly, HighwayMaster supports Qualcomm's recommendation to the FHA to issue final rules which: (1) further define specific criterion for evaluating whether or not a self-monitoring system is "effective" or "presumptively effective"; and (2) amend the definition of "supporting documents" so that it does not include electronic information generated from mobile communications systems and other advanced technology such as on-board computers and transponders unless the motor carrier has elected to voluntarily use the technology generated information in its self-monitoring system.

Additionally, HighwayMaster supports both the FHWA's proposal to allow motor carriers to voluntarily use advanced technology for automated self-monitoring systems in lieu of paper-based self-monitoring systems and the FHWA's proposal for use of waivers to permit the use of other alternative systems that do not meet the FHWA's specific requirements but which offer compensating features that produce safe practices and results.

In sum, HighwayMaster believes that the changes proposed by QUALCOMM to proposed rules on Supporting Documents are necessary to avoid disincentives to motor carriers to invest in automated, electronic monitoring systems which will ultimately result in more efficient transportation of freight and safer motor carrier operations; a benefit not only to motor carriers to all motorists on the highways.

HighwayMaster appreciates the opportunity to comment on the proposed rulemaking. If there are any questions to these comments in this letter, please contact the undersigned.

Sincerely,

Jeff Wisocki w/permission

Jeff Wisocki
Senior Vice President - Customer Development