



National PROPANE GAS Association

1101 17th Street, N.W., Suite 1004 • Washington, DC 20036 • 202/466-7200 • Fax 202/466-7205

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Docket Clerk
US DOT Dockets
Room PL-401
400 Seventh Street SW
Washington, DC 20590-0001

Subject: **Hours of Service of Drivers; Supporting Documents**
FHWA 98-3706; RIN 2125-AD52

DEPT. OF TRANSPORTATION
DOCKET SECTION
98 JUN 23 PM 2:35

Dear Sir/Madam:

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The National Propane Gas Association (NPGA) supports the amendments proposed to the hours-of-service recordkeeping requirements proposed in the subject rulemaking in the April 20, 1998 issue of the Federal *Register*.

NPGA is the national trade association of the LP-gas (principally) industry with a membership of about 3,500, including 37 affiliated state and regional associations, representing members in all 50 states. Although the single largest group of NPGA members are retail marketers of propane gas, the membership includes propane producers, transporters and wholesalers, as well as manufacturers and distributors of associated equipment, containers and appliances. Propane gas is used in over 18 million installations nationwide for home and commercial heating and cooking, in agriculture, in industrial processing, and as a clean air alternative engine fuel for both over-the-road vehicles and industrial trucks.

NPGA considers the subject proposed amendments to be a significant step in implementation of electronic document technology into the operations of motor carriers generally. However, many of our members have not yet fully implemented personal computers, let alone electronic documentation, into their operations. Consequently, NPGA also believes that it is absolutely essential that the *Federal Motor Carrier Safety Regulations* continue to contain provision for manual and hard-copy records for use in verifying driver hours-of-service records.

We would be glad to discuss the foregoing comments further if there are any questions.

Sincerely,

W. H. Butterbaugh, CAE
Senior Technical Advisor

cc: D. N. Myers
R. R. Roldan
P. A. Squair