

CORPORATE OFFICE
1000 N. 14th Street
P.O. Box 7521
Louis, MO 63106
421-6000



HOGAN TRANSPORTS, INC.

EAR-II CITY OFFICE
85 Corporate Woods Drive
Bridgeton, MO 63044
314-421-6000

Docket No. FHWA 98-3706 - 46
Docket Clerk
U.S. DOT Dockets
Room PL-401
400 Seventh Street, S.W.
Washington, DC 20590-0001

DEPT. OF TRANSPORTATION
DOCKET SECTION
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Re: Drivers Hours of Service; Supporting Documents

Very simply put:

Hours of Service first. Supporting Documents later.

I cannot comprehend how we can attack any problem from the rear.

I feel we must first address the end of the problem that produces the end product.

I remind you of the two farmers that wanted to do something special for St. **Patricks** Day, and decided that since there was so much horse manure around their barns, they would dye the future production green with food dye and then they would have plenty ready for the next St. Pats celebration.

One farmer followed his horses around the pasture, picking up their droppings, placing them in a bucket and applying the green dye. This appeared to work well, so he went to inform the second farmer of his successful program.

Upon arrival at the other farm, he found his friend pouring green dye into the food troughs and drinking **waterof** his herd.

This of course, is how I would like to see the FHWA approach the Hours of Service regulation compliance. I think it would be preferable to attack the front end of the problem, and then the solution may be much easier to identify.

Respectfully

David P. McCool
Safety Manager
HOGAN Transports, Inc.



HOGAN TRANSPORTS, INC.

DAVE **McCOOL**
SAFETY MANAGER