



Iowa Department of Transportation

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DOCKET SECTION

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August 7, 1998

DEPARTMENT OF TRANSPORTATION
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DOCKET SECTION

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

Subject: FHWA Docket No. FHWA-98-3414 - 2
Out-of-Service Criteria

Dear Docket Clerk:

Iowa supports placing the North American Uniform Out-of-Service Criteria (OOS Criteria) into the Federal Motor Carrier Safety and Hazardous Materials Regulations.

The OOS Criteria, developed and maintained by the Commercial Vehicle Safety Alliance (CVSA), is recognized both nationally and internationally as a uniform list of conditions deemed sufficiently hazardous to restrict further movement or operation by the driver.

Utilizing the OOS Criteria in conjunction with the Federal Motor Carrier Safety and Hazardous Materials Regulations will not undermine the effectiveness of the regulations or the Criteria.

CVSA has developed rigid procedures justifying changes to the OOS Criteria. The whole CVSA membership must vote on all amendments to the Criteria.

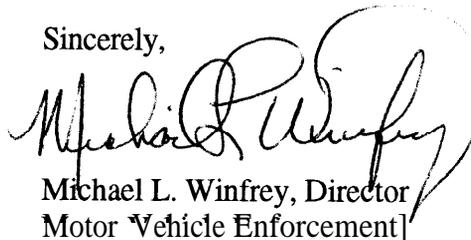
Incorporating the OOS Criteria (in its present format) by reference and as an appendix into the Federal Motor Carrier Safety and Hazardous Materials Regulations enhances the availability of the Criteria to the motor carriers and drivers. Increased availability of the OOS Criteria will enable drivers and carriers to know exactly which safety conditions will place them in jeopardy of continuing their trip. Inspectors are familiar with and believe the format is easy to read and interpret. The OOS Criteria has been streamlined to work within a performance-based system.

Docket Clerk
Page 2
August 6, 1998

Violations detected by commercial vehicle inspectors based on the OOS Criteria should continue to be used as a tool in determining the motor carrier's safety performance record. These statistics can be skewed by conducting only terminal inspections in lieu of actually inspecting vehicles in operation roadside. A carrier with a high out-of-service rate shows both a disregard for the Regulations and the Out-of-Service Criteria.

The wheel does not need to be re-created. Uniform OOS Criteria has already been established and implemented. The Criteria, along with the Minimum Periodic Inspection Standards and Federal Motor Carrier Safety and Hazardous Material Regulations, are effective in removing unsafe vehicles and drivers from our roadways.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael L. Winfrey". The signature is written in a cursive style with a large, looped "W".

Michael L. Winfrey, Director
Motor Vehicle Enforcement]

MLW:jdl