

MINNESOTA DEPARTMENT OF PUBLIC SAFETY



Minnesota State Patrol
District 4700

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DEPARTMENT OF TRANSPORTATION

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September 3, 1998

DOT Docket No. FHWA-98-3414-8
Docket Clerk
U.S. DOT Dockets
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

Dear Sirs:

This letter is in response to your request for comment about the North American Uniform Out-Of-Service Criteria.

We are concerned about the possibility of the Out-Of-Service Criteria being placed in the Federal Motor Carrier Safety Regulations. It is our belief that the Out-Of-Service works extremely well and does so because all of North America abides by the same, uniform criteria. If the Out-Of-Service Criteria becomes part of the Federal Motor Carrier Safety Regulations, Canada and Mexico will not be covered and uniformity will be lost. I don't believe that all **fifty** states have adopted the FMCSR and therefore uniformity within the United States could be jeopardized.

The length of time needed to make changes to the OOSC, greatly increases if the federal rule making process is used. Using the current process, changes are made at the request of company executives, safety officers, mechanics, enforcement **officers**, inspectors, administrators, etc.. It is a very open, non-bureaucratic process. This process allows for equal representation.



ARRIVE ALIVE

The Minnesota State Patrol strongly recommends that the Commercial Vehicle Safety Alliance remains as the caretaker of the North American Out-Of-Service Criteria.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene M. Halverson". The signature is written in a cursive, flowing style with a large initial "G".

Gene M. Halverson

Major