

DEPARTMENT OF TRANSPORTATION

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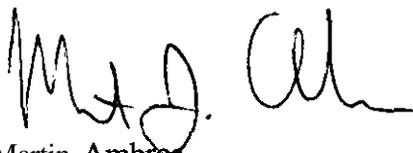
To Whom It May Concern:

Please include into the record the attached comments regarding Docket No. FHWA-97-2979⁴¹ as my written testimony supporting the use of on-board trailer scales for independent shippers by the moving and storage industry.

Air-Weigh believes on-board scales pose an important consumer protection issue and we encourage the FHWA to keep the discussion of their use alive until all the data is collected and thoroughly analyzed.

If you have any questions, or I can be of any further assistance in explaining the use of on-board scales in the transportation industry, please feel free to contact me at 541-343-7884. Thank you.

Sincerely,



Martin Ambros
Chief Executive Officer
An-Weigh

Docket No. FHWA-97-2979

**Written Testimony of
Martin Ambros
Chief Executive Officer
Air-Weigh On-Board Scales
Eugene, Oregon
541-343-7884**

Since 1987, Air-Weigh has marketed its patented on-board scales for air-suspension tractors and trailers. Our company's scales are used successfully around the world by fleet managers and owner operators in many different industries, including moving and storage for corporate shippers, where accurate tractor and trailer weight is a key element in determining customer satisfaction, productivity and profitability.

Because of the consistent accuracy of on-board scales and the benefit to the customer and the shipper, I strongly encourage the Federal Highway Administration to adopt rules allowing independent shippers the choice to use an on-board scale as a **government-** approved option to determine their shipment's weight used to set the cost of their move.

An-Weigh encourages and supports the Federal Highway Administration in developing and imposing standards for on-board scales, so drivers would know which scales are approved for use and customers would have a reassurance as to their accuracy.

On-board scales benefit consumers by providing them with an immediate final cost estimate of their shipment and the opportunity to make real time moving decisions curbside, including requesting a reweigh at an in-ground scale if they are not satisfied with the **on-** board reading.

Drivers benefit from using on-board scales by providing better customer service and saving time, money and fuel by eliminating check-weigh hassles, out-of-route miles, overweight fines and lost revenue from hauling underweight loads.

The use of on-board scales would not create a burden for the industry. Most on-board scales are not cost prohibitive and they are easy to install and operate.

For instance, An-Weigh scales convert truck and trailer air-spring air pressure to accurate weight display. The scale determines how much weight per pound of air pressure the

suspension is supporting by comparing empty and loaded vehicle weights with air pressure required to support the weight. Once calibrated, the scale displays the on-the-ground weight of each axle group to within 200 to 300 pounds of an accurate platform scale.

Retrofitting an existing tractor-trailer, or **specing** a new one, is not a barrier for owner operators or fleet managers. Our customers have told us that, if a driver can install a citizens band radio, they can easily install an Air-Weigh scale. It takes just six easy steps and about four hours to install and calibrate.

As with most on-board scale companies, Air-Weigh provides customers with everything they need to install their scale, including scale with display and keyboard interface, **ComLink** processor for the steer and drive axles, pressure sensor, and all cabling, fittings and parts for installation. The trailer add-on kit includes everything for installation as well as the parts to equip a trailer, jeep, booster or dolly. The trailer kit is specified by **ComLink** channel number. Written and audiotape instructions are included in the package.

The Air-Weigh **AW5200** series scale interfaces with any standard serial printer to print a weight receipt with date and time stamp, axle group weights, gross vehicle weight, net payload weight change and signature spaces. Additional information such as tare weight, vehicle identification and bill of lading number can easily be added to the receipt.

The **AW5200** can also interface with Qualcomm's **OmniTRACS** satellite-based communications system to provide dispatch the ability to identify and divert the closest available truck with room for the shipment, confirm actual weight of the shipment right at the loading site and transmit the billing date for **EDI** paperless invoicing.

AW5200 series scales are currently being tested by several United States-based moving van line companies, agencies and their individual owner operators. The drivers chosen to participate in this field test have 20 or more years of experience in the industry and have received their company's driver of the year award or been accorded similar honors during their distinguished careers. Drivers from Budd Van Lines, Bekins and Allied are participating in the over-the-road tests.

Preliminary information from drivers has indicated that, after proper installation and calibration, Air-Weigh on-board scales are consistently within 200 to 300 pounds of the weight determined by the government certified in-ground scales that they are presently

required to use. Comparative statistical research is currently being conducted and will be forwarded to the Federal Highway Administration when it becomes available this fall.

Air-Weigh will also provide the Federal Highway Administration with information concerning the Australian Parliament's expected approval of on-board scales for the trucking industry in that country. Presently the state of Victoria Roads Commission has adopted the use of on-board scales as part of its Heavy Duty Vehicle Reform Package, a ten **step** program that eliminates state-by-state restrictions and implements national rules and standards for the entire trucking industry. Parliamentary action is expected soon.

In closing, Air-Weigh believes on-board scales can make the moving industry more customer service driven. On-board scales provide customers and drivers with the immediate information they need to make important personal and budgetary decisions.

Customers have a right to know the weight of their shipment before it leaves their home or office. They need the option to have an immediate, accurate estimate of their final charges as well as the chance to make curbside shipping decisions, such as off-loading part of the shipment because of budgetary constraints. Customer should also have the opportunity to demand a reweigh.

Drivers need on-board scales to maximize their time and efforts by saving time, money and fuel by eliminating unnecessary check-weigh hassles, out-of-route miles, overweight fines and lost revenue from hauling underweight loads.

An-Weigh supports the federal approval of on-board scales for the moving and storage industry and welcomes the opportunity to work with the Federal Highway Administration to further examine their use so customers and drivers have the immediate information they need to make prudent decisions.

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