

47701

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Docket Clerk  
U.S. DOT Dockets  
Room PL-401  
400 7<sup>th</sup> Street, S.W.  
Washington, D.C. 20590-0001

DEPARTMENT OF TRANSPORTATION  
98 DEC - 7 AM 11: 39  
DOCKET SECTION

Dear Sir/Madam:

Reference: Docket No. FHWA-98-3414-32

The North American Uniform Out-of-Service Criteria does not address the roadside inspection of the emergency braking systems on commercial motor vehicle(s). After completing an investigation of a crash involving a commercial motor vehicle in which the driver was fatally injured due to the failure of both the primary (service) and secondary (emergency/parking) braking systems, it is evident that this issue needs to be addressed.

The truck/tractor and trailer loaded in excess of 100,000 pounds ran down a 3 mile long hill (10% drop in the 3 miles) to a T intersection where the crash occurred.

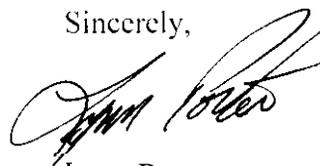
My concern is the inspection of the emergency braking system and the spring in a spring brake chamber. The above mentioned vehicle(s) had 4 of 8 defective chambers (broken springs). In addition, there were adjustment problems on 3 other emergency brakes, leaving the vehicle(s) with only 1 operative brake as it made its fatal down hill run

I feel that not addressing the inspection of the emergency braking systems on commercial motor vehicle(s) at the roadside is a problem that has been overlooked, due to the fact that vehicle(s) are equipped with dual air braking systems. The concept of the dual braking system has created a false sense of security. The dual braking system is good as long as there is sufficient air supply. When the air supply is depleted the braking system become ineffective, therefore the spring operated emergency brake system would automatically engage (assuming it is functioning properly). In the fatal crash described above, had the emergency spring braking system functioned properly the driver would be alive today.

If I have not made my concerns clear, please contact me at (207) 622-8358,

Thank you for your consideration

Sincerely,



Lynn Porter  
Maine State Police,  
Motor Carrier Inspector