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March 24, 2000

Docket Clerk  
Attn: Docket No. OST - 99 - 6578 - 51  
Department of Transportation  
400 7<sup>th</sup> Street, SW, Room FL40 1  
Washington, DC 20590

Attn: Ms. Mary Bernstein, ODAPC

Dear Ms. Bernstein,

I am writing to express our companies concern over part of the NPRM. As a small employer many of the proposed changes to 49 CFR Part 40 will place a new and significant financial burden on our company.

Some, but not all, of the concerns we have are:

Regarding the purposed direct reporting of MRO and SAP reports to our company Instead of through our Third Party Administrator: This requirement will place new financial burdens upon us including, but not limited to new secure fax lines and equipment for the receiving of MRO/SAP reports and additional staff and training to handle these reports.

Regarding the addition of new specific contract language: This will place a Financial burden upon our company by requiring an expensive review of the DOT's changes by our attorney and our own management. Moreover, we feel that his proposed language is a direct interference with our right to conduct our transactions as we best see fit.

The above changes will have serious financial consequences on our company and we strongly urge the DOT to delete these items from the final rule.

Sincerely,

Duane Phillips Jr.

COMMUNICATIONS SECTION  
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