

86265

DEPT. OF TRANSPORTATION
ST-1075

00 JUN 29 PM 3:00



Dockets Management System
US Department of Transportation
400 Seventh Street, SW
Washington, DC 20590-0001

June 28, 2000

To Whom It May Concern:

Reference: RSPA-99-6283-29

I apologize for my timing in writing this letter commenting on the proposed changes in the document ST-1 considering that the deadline for comments is June 29, 2000. I hope that my comments and concerns in the following paragraphs will help in the formulation of the final regulation.

The items that stood out the most involved the proposed change in placarding. Currently, only vehicles carrying Y-III shipments need to have placards on the vehicle. The proposed change would require placards to be on the vehicle carrying any radioactive labeled material. This change would include W-I and Y-II labeled packages even though their radiation fields are so low that the monthly ring badge and monthly body badge exposure is minimum for the individuals making the deliveries.

In part, some of the costs that my company would have to incur in order to comply with the proposed changes include:

- 1) Increase in wages due to only being able to use delivery personnel with a commercial drivers license(I currently use retired individuals who are reliable)
- 2) Complying with the required physicals and health tests (the cost of the tests, the cost of the documentation program to track each employee, the labor cost for each employee taking the tests)
- 3) The possibility of being required to obtain and pay the annual fees for a commercial carrier's license and the cost of creating and watching a program that complies with the different requirements related to that new classification
- 4) Establishing and maintaining a program that monitors each delivery employee for drug/alcohol and hours worked in each 24 hour period for 7 days each week.
- 5) Additional costs associated with the new requirements impact on the delivery vehicles
- 6) Other costs not yet realized

All considered, I would have to hire at least one additional management trained person in each pharmacy to assist the manager in monitoring the new requirements. My hourly wages could double and I will have additional expenses in several new areas. The total annual costs per pharmacy could well exceed \$100,000.00 without any benefit to public safety.

I know this letter is brief but the concerns and costs are real. Please reconsider the proposal with the small business person's interest in mind. Maybe someone could request a special impact evaluation the proposed regulation would have on small business and compare that to my comments.

Thank you in advance for you consideration,

A handwritten signature in black ink that reads "Gregory S. Hiatt P.D." The signature is written in a cursive, slightly slanted style.

Gregory S. Hiatt P.D.
President
Spectrum Pharmacy, Inc.

1301 Milburn Blvd
Mishawaka, IN 46544
(219) 255-5072