

I am a truck driver and I work for Sound Transportation out of Tacoma, WA. They are a long haul flat bed oriented company and therefore I would fit into the type 1 classification of your proposed new rules for hours of service. I am definitely in agreement that the existing rules have long been in need of revision. As the rules are now written, I constantly find it impossible to get the proper amount of sleep. Because the current rules are based on an 18 hour cycle of sleep and rest, by the third day of my work week the existing rules say that I can safely drive through the night and then sleep during the day. Then, three days later this pattern is reversed again. This is blatantly a ridiculous situation, and would never be tolerated in any other industry.

The new rules are a positive step forward for the simple reason that they are based on a normal 24 hour work/sleep cycle. The new rules would definitely allow any truck driver to get adequate rest. However, it is possible to go too far in the direction of providing rest, and thereby substantially affect two areas that are of important interest to me. One of these is productivity, and the other is the truck drivers lifestyle and homelife. The new rules will have a very high negative impact on these two areas.

Productivity would be adversely affected in two ways. Firstly, the daily working hours of the trucker would be reduced 20% from 15 hours to 12 hours, limiting the amount of work that any one driver can accomplish. Secondly, requiring a two hour break in the middle of my work day, makes no allowance for the tough schedules often required by shippers and receivers. If a mandated break causes the driver to arrive after everyone is gone home for the day, then he must wait till the next day for loading or unloading. This can easily cost the driver one or more days of pay per week. Most long haul drivers get paid effectively as a percentage of the load, and any new rules that decrease their productivity would also represent an immediate pay cut.

My lifestyle would also be adversely affected, because the proposed new rules would require me to be on the road for more days to complete the same trip. Under current rules and working up to 15 hours per day, I could complete a 70 hour trip in 5 days. The same trip under the new rules would require me to be away from home for 6 days. Being away from home for 6 days as opposed to 5 days, in order to make exactly the same amount of money, would be a hardship on my life.

I am sure reasonable new for hours of service rule can be worked out that would allow truck drivers to operate on a 24 hour cycle, get plenty of rest to drive as safely as possible, and without a severe adverse affect on productivity and the truck drivers homelife. If you divide the current 70 hour limit by the 5 days this is allowed to be driven in, the result is 14 hours per day. 14 hours on duty plus 10 hours off duty would add up to a 24 hour cycle that at least would be a far better system than is now in place. Realizing that there are many that would argue that 14 hours of work a day is too much and knowing that 12 hours per day is too little, it would seem that a workable compromise would not be impossible.

Thank-you for allowing to make these comments and listening to how one truck driver sees it from his side.