



01 MAR 15 AM 10:59

124351

March 12, 2001

U.S. Department of Transportation
Dockets Management Facility, Room PL-401
400 Seventh Street, SW.
Washington, D.C. 20590-0001

Reference: FMCSA Docket No. FMCSA-97-2289 -51
RIN 2126-AA27

To Whom It May Concern:

The attached is a copy of Kinedyne Corporation's comments, concerning the above listed Docket Number.

If there are any questions concerning our comments, please call me or E-mail me at jtakacs@kinedyne.com.

Sincerely,

A handwritten signature in cursive script that reads 'Joe Takacs'.

Joe Takacs
Director of Engineering

Kinedyne Corporation
151 Industrial Parkway
Branchburg, NJ 08876-3451
908-231-1800
Fax: 908-231-6887

Kinedyne Corporation
1104 Washington Ferry Road
Prattville, AL 36067-4898
334-365-2919
Fax: 334-361-1665

Kinedyne Corporation
3701 Greenway Circle
Lawrence, KS 66046-5442
785-841-4000
Fax: 785-841-3668

Kinedyne Corporation
10096 Sixth Street, Unit E
Rancho Cucamonga, CA 91730-5750
909-980-2003
Fax: 909-945-1840

KINEDYNE CORPORATION'S COMMENTS ON FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION'S NOTICE OF PROPOSED RULEMAKING ON 49 CFR PARTS 392 AND 393, DATED DECEMBER 18, 2000 IN THE FEDERAL REGISTER (FMCSA DOCKET NO. FMCSA-97-2289)

Update the webbing reference in Paragraph 393.102 (d) (3) to Web Sling & Tiedown Association's RECOMMENDED STANDARD SPECIFICATION FOR SYNTHETIC WEBBING USED FOR TIEDOWNS WSTDA-T1 dated 1998.

Update the Web Sling & Tiedown Association, Inc. address in Paragraph 393.7 to:

Web Sling & Tiedown Association, Inc.
5024-R Campbell Blvd.
Baltimore, MD 21236-5974
<http://www.wstda.com>

Direct Verses Indirect Tiedowns

The definitions for Direct and Indirect are confusing even to the people that are familiar with cargo securement tiedowns. The definitions need to be clarified so the truck drivers, shippers and law enforcement people understand them. The proposed comments by the North American Cargo Securement Standard Harmonization Committee seem easier to understand.

Prohibition on the Use of Unmarked Tiedowns

The addition of inspecting vans (trailers) creates a problem if synthetic web tiedowns do not have a WLL marked on the tiedown. There are 2 inch synthetic web tiedowns used in vans (normally referred to as logistic tiedowns) that have a normal WLL of only 1000 lbs. vs Flatbed vehicle synthetic web tiedowns that normally have a WLL of 3335 lbs. The chart that shows the unmarked rating of a 2 inch synthetic web tiedown lists a 2000 lb. WLL for unmarked tiedowns.

For this reason, we believe that at some point in time (2 or 3 years) after the new regulations are in effect, that unmarked tiedowns should be considered out-of-service. If vans were not included in the new standard then the existing charts would still apply.

Mandatory Rating and Marking of Anchor Points

The marking of WLL on anchor points is just as important as marking the WLL on tiedowns. With this new regulation, when the cargo is properly secured with

tiedowns, the next "weak link" would be the anchor points. We believe that the anchor points should have a WLL marking or a label on the vehicle that indicated the WLL of each anchor point. This should be incorporated on all vehicles covered by this regulation. The implementation should be after a reasonable time period for vehicle manufacturers to incorporate this requirement.

The vans present a problem for marking anchor points. The track that is used inside vans can not be rated with a WLL marking on the track. The WLL of these track anchor points depend on the tiedown end fittings that attach to the track and the track attachment strength to the vehicle. These tracks should be exempt from requiring WLL markings.

The load bars (bars that have rubber or plastic "feet" that utilize friction against the sides of the vehicle to stabilize the cargo) can not have a WLL rating. These bars are only to be used to stabilize cargo within the van.

Proposed Implementation Date

The proposed implementation date for marking WLL on synthetic web tiedowns used in vans should be 12 months after regulation goes into effect. This will allow existing inventory of the logistic tiedowns, without the markings, to be sold.

Marking anchor point WLL should be 18-24 months after implementation of the regulation.

Request for Comments

The safety requirements for tiedowns, paragraph 2.1.3 of Draft 4 of the Model Regulation should be incorporated into paragraph 393.102 or .104. "A tiedown, except for steel strapping, must be designed, constructed and maintained so that the driver of the vehicle can tighten it. Each tiedown must be attached and secured in a manner that prevents it from becoming loose, unfastening, opening or releasing while the vehicle is in transit."

Kinedyne Corporation commends the efforts of the Federal Motor Carrier Safety Administration, Canadian Council of Motor Transport Administrators, Commercial Vehicle Safety Alliance, Transport Canada, and all the companies, associations and persons involved in developing the North American Cargo Securement Standard. This was a very good example of government and industry working together to develop meaningful standards. We hope that this type cooperation continues in the future for similar projects.