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U. S. Senate **May 28, 2001**

Washington, D.C. 20510-3704

Dear Honorable Representatives of the American People of the U. S Senate:

I request that you consider supporting OOIDA and Rep. James Oberstar (D-MN) resolution to delay granting Mexican trucks authority to operate in the U.S. under NAFTA until a prescribed comprehensive plan to ensure their safety is in place; announced at a press conference by Rep. Oberstar and co-sponsor Rep. Jack Quinn (R-NY) in Washington on Thursday, May 24. Representatives of OOIDA, trade unions and a number of congressmen attended the event from border districts. Thirty-one additional lawmakers are listed as original co-sponsors of the resolution (see below):"

1) Hon. Robert A. Borski
2) Hon. Sherrod Brown
3) Hon. Richard A. Gephardt
4) Hon. Edolphus Towns
5) Hon. Tim Holden
6) Hon. John D. Dingell
7) Hon. Bob Filner
8) Hon. Ciro D. Rodriguez
9) Hon. William O. Lipinski
10) Hon. Bill Pascrell, Jr.
11) Hon. Joe Baca
12) Hon. Michael M. Honda
13) Hon. John Elias Baldacci
14) Hon. Jack Quinn
15) Hon. Shelley Berkley
16) Hon. Bob Clement
17) Hon. Nick J. Rahall, II
18) Hon. Robert E. (Bud) Cramer, Jr.
19) Hon. Peter A. DeFazio
20) Hon. Elijah E. Cummings

21) Hon. Jerry F. Costello
22) Hon. Eddie Bernice Johnson
23) Hon. Jerrold Nadler
24) Hon. Max Sandlin
25) Hon. James P. McGovern
26) Hon. Juanita Millender-McDonald
27) Hon. Jim Matheson
28) Hon. Rick Larsen
29) Hon. Marion Berry
30) Hon. Susan A. Davis
31) Hon. Frank Mascara

Sen. Ernest Hollings (D-SC) and Rep. Jim Oberstar (D-MN) initially requested the U.S. Department of Transportation's Inspector General to analysis and issue a status report relating to safety and enforcement regulations before an increase of an estimated 190,000 Mexican trucks are allowed complete access to the U. S. highways and byways. "The status report released on May 8 found plenty of critical gaps in current procedure and recommended specific actions to ensure that Mexican trucks coming across the border are safe." The IG did not have the benefit of reviewing the Federal Motor Carrier Safety Administration (FMCSA) strategies scheduled for release in June 2001. "FMCSA spokesman Dave Longo says the official implementation plan was not available for the Inspector General's office to review because it wasn't done."

The IG's report reflects the following assessment:

- "The enforcement effort has a long way to go before the government can assure that cross border trucking is not dangerous to the public;"
- "During fiscal year 2000, federal and state inspectors performed more than 46,000 inspections on Mexican trucks at the border. For those inspected, the out-of-service rate declined, from 44 percent in 1997 to 36 percent in 2000. This contrasts with a 24 percent out-of-service rate for U.S. trucks nationwide. While the report acknowledges the decline in the out-of-service rate, the study shows that those numbers are not necessarily assuring;"
- "A direct correlation exists between the condition of Mexican trucks entering the United States and the level of inspection resources at the border. FMCSA studies show the out-of-service rate for Mexican trucks inspected at Otay Mesa, CA, where inspectors are present during all commercial operating hours, was 23 percent compared to 50 percent at one crossing in El Paso, TX, where neither federal nor state inspectors were present during all operating hours;"
- "The IG's report determined that FMCSA shouldn't assume Border States will deploy inspectors at all border crossings during all hours of commercial operations to ensure the safety of Mexican trucks and to enforce federal registration requirements. Arizona, New Mexico and Texas did not provide

inspectors during all operating hours. For all six Arizona crossings, commercial vehicle enforcement officers perform safety inspections on a part-time basis. At the New Mexico and Texas border crossings none of the inspectors are full-time inspectors. In addition, it cannot be assumed that the additional $18 million FMCSA requested in its 2002 budget will be used to staff inspection facilities with state personnel. Texas would only hire additional inspectors for the border if state lawmakers authorized the inspectors, and not because additional grant funds were provided. The Texas legislature is scheduled to adjourn May 28 and won't convene again until 2003;"

- "The IG points out that enforcement capabilities differ at each border crossing. At 20 crossings, FMCSA inspectors did not have dedicated telephone lines to access databases, such as those for validating a commercial driver's license. At 19 crossings, inspectors had space to inspect only one or two trucks at a time. According to the report, at 14 crossings, inspectors had only one or two spaces to park vehicles placed out of service. Also, the out-of-service space was shared with the inspection space at the majority of these crossings;"
- The Inspector General found that verification and enforcement of registration information at the border remains inconsistent. During recent visits to border facilities, the IG's office found that FMCSA continues to rely on the U.S. Customs Service and federal safety inspectors at border crossings to review certificates of registration and ensure compliance with operating authority statues. FMCSA inspectors reviewed the certificates of registration as part of the safety inspections performed at the border crossings. The U.S. Customs Service, however, is not required to review certificates of registration as Mexican trucks enter the United States, and did not routinely do so at each border crossing;"
- "The IG's office also found that reviews of certificates of registration by state safety inspectors continued to differ from state to state. Since 1992, California has had a state law to fine Mexican motor carriers operating without a certificate of registration or operating beyond the commercial zone. State inspectors in Arizona, New Mexico or Texas did not routinely review the certificates of registration because state laws are not compatible with federal requirements regarding operating authority, (no operating authority has ever been required by Arizona, New Mexico or Texas). Consequently, unless the truck happens to be selected for a safety inspection by a federal inspector at the border, the certificate of registration will probably not be reviewed;"
- "The Inspector General recommended that FMCSA increase the number of federal safety inspectors at the border to at least 139 (in March 2001 there were 50) to enforce federal registration and safety requirements during all port operating hours and provide the requisite inspection facilities."
- "The reports acknowledged that Mexico has made some progress in establishing safety requirements for its motor carrier operations. According to the Inspector General's report, Mexico recently issued a rule requiring all

commercial drivers to log hours of service, issued a standard for its inspections of commercial vehicles and automated its information systems for motor carriers, commercial drivers and vehicles;"

- "The IG's report recommended FMCSA finalize and execute a comprehensive plan that identifies specific actions and completion dates for the implementation of NAFTA's cross-border provisions and that reasonably ensures safety at the southern border and as commercial vehicles cross the United States." Information relating to NAFTA cross-border trucking status report was obtained by OOIDA web site and written by Keith Goble, OOIDA staff writer. **Information can be verified at DOT Web Site:** http://www.oig.dot.gov/audits/mh2001059.pdf

No doubt this analysis reflects the present situation and in April 2001 Mexican Truckers illustrated their lack of understanding for U. S. Federal DOT regulations relating to truck safety.

"According to the Nogales International newspaper, April 9, 2001, about 75 Mexican owner-operators and contract haulers blocked the two commercial lanes at the Nogales Port of Entry, causing about 1,300 trucks to be stuck in a 10-mile line of traffic. Mexican truckers accused the Arizona DOT of "unjust inspections of commercial vehicles." The angry drivers said the ADOT was targeting drivers instead of truck owners. Citations for unsafe vehicles have ranged up to $11,000 for faulty brakes and worn tires."

"U.S. government, representatives of the drivers and industry officials hashed out their differences and reassessed policy about who is cited for violations. Frank Valenzuela, a spokesman in Phoenix with the state Arizona Department of Public Safety (DPS), told reporters that the drivers were ultimately responsible for the safety of the trucks they drive. The Arizona DPS reached an agreement with representatives of drivers who blocked the Nogales Port of Entry but 1,300 trucks were stranded for several hours."

"About half of the protesters drive trucks for the produce industry, while most of the others drive rigs for the maquiladoras -- (assembly plants) in Mexico. If a Mexican trucker received five citations, it would mean the loss of his license to drive in the United States. "What happened last week is that DPS inspectors both put vehicles out of service and cited drivers," said Beau Johnson, chief of DPS enforcement during a press conference at the port. "Drivers will still face citations for serious equipment violations and those who repeatedly cross the border with problem vehicles will also be cited," he said. Mexican trucks have gone from a 70 percent out-of-service rate to between 40 to 48 percent today, Johnson noted. "The average for U.S. trucks is about 18 to 24 percent for comparison," he said. "That's better, but we need to continue lowering the rate." The blockade at the port hit on the same day President Bush released his budget, which included $154 million for inspectors and facilities to handle increased Mexican truck traffic at the border ports under NAFTA. Cox News

Service and several other major newspapers April 10, 2001 reported that the U.S. Department of Transportation that the Bush administration plans to allow Mexican trucks full access to U.S. highways starting Jan. 1, 2002. The plan would require Mexican rigs to comply with U.S. safety regulations and have insurance with U.S.-registered agents, according to published reports." Information was obtained from OOIDA's Web site."

I wonder if Mexican truckers really comprehend what U. S. Truckers must adhere to where it relates to Federal and State laws? Is 154 million dollars enough to increase federal inspectors in the quantity necessary for an increase of 190,000 Mexican trucks with unrestricted access to U. S. highways/byways?

Addressing NAFTA cross-border trucking is not the only alarming problems facing the trucking industry. When the news reports "The trucking Industry has requested 19 year old Drivers be allowed to drive interstate, proposing a comprehensive training program..." I must ask: "Who represents the trucking industry?" I thought Small Trucking Businesses and Owner-Operators made up the largest percentage of the trucking industry! Experienced drivers are finding there's no profit in trucking. Tell me how any trucking company can make a profit averaging $1.17 RPM when Small Trucking Businesses and Owner Operators are loosing money hauling cargo, freight and or produce when their lucky enough to receive on a rare occasion $1.30 per mile? In many states your lucky to receive $1.00 per mile and C. R. England posting their minimum rate of $1.00 per mile for refer loads should caution everyone what Mexican Carriers and Owner Operators will one day receive for transporting cargo, freight and or produce in the year 2002 in the U. S. of America.

"Already in the past 120 days, some 3,600 mostly small fleets or more have ceased operations. Closings have enabled large truckload carriers such as Celadon to alleviate their chronic driver shortage. "There is no shortage of drivers," said Paul Will, Celadon's CFO. "There is a shortage of qualified drivers."

The Trucking Industry is in trouble and next year when 190,000 Mexican Trucks are allowed to travel the highways and byways of the U. S., safety violations, accidents and Small Trucking Business closures will increase. Majority of American Owner-Operators and Small Trucking Businesses will not travel every highway/byway of Mexico because city-to-city Mexican police will extort money and bandito's will steal their trucks. I've lived in Mexico for several years. When I lived in Mexico, one of my pickups was stolen and I was routinely pulled over by the police because my F250 4by4 Super Cab Ford Pickup was new. At the minimum, Mexican DOT escorts of a group of American Trucks driving the highways and byways of Mexico will be necessary before every U. S. Owner Operators and Small Trucking Businesses will fill safe to enter Mexico, traveling to Mexico City, etc. There are trucking companies that do travel to Mexico and are familiar with international commerce infrastructure.

"The Indianapolis-based Celadon Trucking Company will benefit from the full opening of the U.S.-Mexican border to all North American carriers. "Incorporated in 1986, Celadon was formed primarily to provide trucking services for Chrysler Corp. to and from its Mexican assembly plants (sic). Since that time, Celadon has grown to be largest U.S. carrier in and out of Mexico, moving 150,000 trailer loads annually south of the border. Cross-border traffic accounts for 65 percent of its business. Overall, Mexican traffic is growing at 17 percent a year; nearly twice the rate at what domestic truckload traffic is growing."

"No truckload carrier has suffered worse from the driver shortage than Celadon. It had four straight losing quarters last year when it could not find enough drivers for its trucks. For the 2000 fiscal year ended last June 30, it had a net loss of $2 million on $351.6 million revenue, compared with $4.8 million earnings on $281.8 million revenue in 1999. Celadon Group's stock has plummeted nearly 90 percent in the past year. It was trading at $33 last March when dot-com-crazed investors mistook the company for an Internet play because of its plans for something called "TruckersB2B," a cooperative buying service for small fleets. At press time last week, Celadon shares were trading around $3.50."

"Even ING Barings, which managed Celadon's recent public securities offering and makes a market in the shares of the company, says Celadon is risky even with its current "strong buy" recommendation. A recent ING Barings summary of the company warns that although Celadon's shares are undervalued (its book value is $7.26), ownership "may be suitable for only small-cap, high-risk accounts given its limited float and financial position."

"Celadon also has been on an acquisition binge. It bought the assets of General Electric Transportation Services for $8.2 million in 1997. In 1998, it acquired Gerth Transport of Canada. In 1999, it acquired Zipp Express to strengthen its Midwest position. Those acquisitions have changed Celadon's driver mix as well. Prior to those acquisitions, 82 percent of Celadon's capacity was provided by company-owned and leased equipment. As of last June 30, owner-operators now account for 40 percent of its capacity. Of its 2,560 tractors as of June 3, 2000, 1,024 were owner-operators."

"Celadon is hoping to get back into the black this fiscal year. Last year, its truckload operations posted $8.8 million operating income while TruckingB2B.com had a $4.7 million operating loss. But Celadon is weighted down by debt at $49.7 million, compared with $18.7 million in the 1999 fiscal year. It recently completed a $67 million credit agreement with ING (U.S.) Capital LLC. Net interest on that debt rose by $1.8 million last year, or 24.3 percent, to $9.2 million in fiscal 2000, compared with $7.4 million of interest expense in fiscal 1999, the company said. Its trucking operation has seen a steady deterioration in operating ratio - from 93.1 in 1998, 94.6 in 1999 to 97.5 last year. That's because its fleet size remained static at around 1,950-seated tractors for the past two years. Celadon revamped its driver-recruiting department last summer, adding 100 new drivers this year and has plans for adding 100 later in the year."

"Fleet growth is critical," said David A. Shatto, Celadon's executive vice president of operations. He noted that every seated truck adds $4,000 a month to Celadon's bottom line. Celadon has been trying in the last few years to wean itself off the now Daimler Chrysler traffic. Through diversification, it is doing that. Daimler Chrysler represented 37 percent of Celadon's total revenue in 1998, but only 24 percent last year. That was a conscious decision as Daimler Chrysler increasingly has become known in the industry as a tough shipper on both original equipment inbound auto parts and after-market replacement parts. No other Celadon shipper accounts for more than 10 percent of its revenue. All the non-Chrysler business was up 8 percent in the most recent quarter, Celadon officials said."

"Besides avoiding the Schneiders and J.B. Hunts that dominate the east-west domestic truckload traffic in this country, Celadon's north-south strategy is well timed in the NAFTA age. It knows the territory south of the border, the customs and the infrastructure."

"There also are hard economic gains through use of Mexican drivers. An American driver at Celadon earns on average 39.4 cents a mile, or 34 percent of its average rate of $1.17 a mile. But a Mexican driver earns just 11.8 cents a mile, or 15 percent of the average rate;" as reported by John Schulz, Traffic World.

There are brokers that are presently brokering loads for $1.10 per mile or lower allocated to Small Trucking Businesses and Owner-Operators. January 1, 2002 rate per mile will be below $1.00 per mile allocated to Mexican Motor Carriers and Owner-Operators, forcing "EXPERIENCED" U. S. Owner-Operators and Small Trucking Businesses to either quit or shut their trucks down. U. S. Motor Carriers may find it more cost effective to register their trucks and originate a trucking business in Mexico if Mexican trucks are not held accountable to U. S. FMCSA, FHWA, DOT, IFTA, SSR, IRP, States Weight and Mile Distance Tax regulations and driving hours on duty laws. Examine this possibility critically; the outcome is essential to the well being of the trucking industry. Mexican Trucking Businesses and Owner-Operators pay Mexican Federal Tax not U. S. Federal Tax and Mexican Federal Tax is less then U. S. Federal Tax.

In order to compete in the trucking industry January 1, 2002, at a time when rate per mile is lower than summer months; Mexican Motor Carriers will be accepting less then a $1.00 per mile from brokers/shippers (whom will take advantage of the crisis) hauling cargo, freight and produce throughout the U. S. on every highway/byway.

Those U. S. Small Trucking Businesses and Owner-Operators still afloat will be forced to take action in order to survive. There is no reason to believe that cargo, freight, or produce won't be hauled for less then a $1.00 per mile January 1, 2002. U. S. Motor Carriers such as C. R. England were advertising their minimum at a $1.00 per mile (Refer) on the Internet and brokered loads in many western states are a $1.00 per mile or less for Flatbed, Dry Van or Refer. Small Trucking Businesses and Owner-Operators are unable to transport freight, cargo or produce for less then a $1.35 per mile and because no one can consistently receive a $1.35 per mile, business closures are occurring and at an alarming rate and unless someone takes action, introducing common sense legislation, a minimum of 100,000 trucking businesses will either quit or shut their trucks down within the first quarter of 2002. Those willing to continue will not earn enough revenue for new truck/trailer payments transporting cargo, freight or produce at a $1.00 per mile and under.

If it becomes evident that there is a clear advantage to operating under Mexican DOT authority, others will originate a Mexican Trucking Business and register their trucks with Mexico DOT. The cost to register your truck with Federal Mexico DOT Plates is under $2,500.00, allowing unrestricted access to all highway/byways in Mexico. The cost of originating a trucking business or corporation is under $1,000.00 and obtaining your dual citizenship can be achieved for under $600.00. The Mexican Goverment accepts street address accompanied with Post Office Boxes for your business or corporation. The majority of U. S. Small Trucking Businesses and Owner-Operators will not travel throughout Mexico without an escort but would benefit from opening a Mexican Trucking Business, operating under Mexico DOT authority; "if Mexican Motor Carriers become exempt from "U. S. FMCSA, FHWA, DOT, IFTA, SSR, IRP, States Weight and Mile Distance Tax regulations and driving hours on duty laws."

Will it be more cost effective to register your truck in Mexico, originate a Mexican Business and pay Mexican Federal Taxes rather than U. S. Federal Taxes?

Very Respectfully,

Bruce Wayne Henion

BRUCE WAYNE HENION

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March 6, 2001

The Honorable George W. Bush
President of the United States
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20500

Re: Issues related to the entry of Mexican trucks into the United States.

Dear President Bush:

I'm the traffic manager for the traffic-sourcing department for Cecil R. Hutton/Nu-West Transport (MC No. 340874 P) and Brokerage (MC No. 375872 B). TIN No. 93-270364. Nu-West Transport operates in California and has been assigned a Carrier No. CA 203963 in the California Highway Patrol's Management Information System of Terminal Evaluation Records (MISTER). Nu-West Transport has 39 trucks operating under Nu-West authority and 59 additional Motor Carriers leased to Nu-West Transport haul loads provided by Nu-West Transport from shippers under contract with Nu-West Transport.

Covey Run (MC: 262763 - W-9/TIN NO. 93-1296346) and KD Sand and Gravel (MC: 354656 P - W-9/TIN NO. 9305928670) provide an assortment of flatbed, step deck, roll top flats, curtain vans and a fleet of dump trucks available to shippers and customers for delivery of cargo, freight, produce, rock and sand. As an Agent for these Small Trucking Businesses, I am able to coordinate customer-shipping needs, negotiating rates.

On behalf of my Small Trucking Businesses and Independent Owner Operators throughout America (69% of the 425,000 Motor Carriers based in the U. S. (1996 figures), representing the backbone of American and International shipping transportation industry, I appeal to your good judgment, seriously considering those concerns hundreds of thousands of American Small Trucking Businesses, Owner-Operators, Owner-Operator Independent Drivers Association ("OOIDA") and the American people have in relationship to truck transportation related problems:

A. Driver hours restrictions
B. Lack of necessary rest areas

C. Lack of truck stops on the border of the U. S. and Mexico
D. Immigration
E. Customs
F. Cut throat rate per mile practices
G. Illegal tobacco, firearms and drug traffic
H. U. S. Highway weight restrictions
I. Cargo and liability insurance requirements necessary for the safety of everyone sharing the highways and byways of our nation.
J. CDL License

President Johnson, OOIDA in behalf of everyone, has requested that you "maintain border restrictions until trucks comply with U.S. laws related to safety, immigration, and customs."

The Inspector General of the Department of Transportation research illustrates that Mexican trucks are in terrible physical shape and fall well short of compliance with our safety regulations as expressed by President Johnson. When I was living in BA JA, CA Mexico, Mexican truck owners I associated with took great pride in maintaining their trucks.

Addressing current problems submitting solutions is the only true course to take. I recommend the following:

A. Accept OOIDA recommendations submitted on Driver hour's restrictions and make mandatory Mexican drivers to honor log book and driving standards and regulations. Those drivers out of hours upon entrance into the U. S. based on averaged time traveled from their origin (taking into consideration speed limit and city delays) must shut down until their hours off duty have gained them driving hours consistent with U. S. standards and then from that minute forward, maintain a driver log book.
B. Accept OOIDA recommendations building more rest areas because we need them.
C. Build truck stops on the border designated for a secondary inspection station insuring Mexican trucks meet FHWA and DOT regulations and standards. I know of developers that have property on several border crossing areas in various states whom desire their property to be developed as truck stops with current approvals by State and County officials. Business plans completed. BA JA needs a truck stop inside Mexico in between Ensenada and Rosaritio on the Quota. LA CASA REAL is well suited for a regional truck stop. The area I chose to develop consists of approximately 600-acres and is in between Bajamar world-class golf course and Ba Ja Seasons RV Resort next to the ocean. The area is known as Ejido Ursulo Galvan. This truck stop would provide BA JA peninsula cities such as Camalu, known for their Tomatoes, Sonora, Ensenada, Mexicalli, San Felipe, etc., a Mexican DOT inspection Station allowing for in house enforcement to ensure Mexican trucks adhere to U. S. FHWA/DOT regulations and standards. San Ysidro and Calexico,

California; Santa Teresa, New Mexico; and other boarding cities/states should be evaluated for development of secondary Truck Stops/U. S. DOT inspection stations.

D. Originate a toll free hot line verifying Mexican Authority, labiality and cargo insurance. U. S. DOT hotline for Motor Carrier and or Broker verification of authority, BOC-3, cargo and liability insurance is 202-358-7000.

E. If Mexican trucks are allowed INTRA traffic within states, make it against the law for shippers to allocate less then the cost to operate a truck based on the attached Expense and Revenue Motor Carriers experience every trip.

F. Construct Green Light Weigh Stations (Electronic weigh in motion systems successfully implemented in Oregon) inside Mexico in order to determine weight prior to trucks entering America. Trucks over weight may unload their cargo at a border truck stop equipped with a distribution station. The Weigh in Motion system will alert Truck Stop Distribution Centers and DOT.

G. Immigration and customs officers must have access to U. S. DOT Motor Carrier information relating too authority and insurance, carrier/owner operator safety records, driver drug programs, truck/trailer identification and computer analysis of Green Light Stations verifying truck/trailer axle weights, etc., inside Mexico placed on main Mexico Highways, alerting U. S. DOT 100 miles prior to truck crossing into America which violations/standards truck is not adhering to. In this way, truck can be routed to the proper truck stop inside Mexico or on the border in the U. S (1/4 mile radius) in order for the Owner-Operator and or Motor Carrier the means and ability to correct any deficiency in weight standards or regulations/standards not met.

H. Make it against the law for shippers to pay less than $1.00 per mile for a 48,000 lb load.

I. Introduce Weight and Mile Distance Tax to Mexican DOT.

J. Heavy Motor Carrier fines to use false CDL. Dual Mexican and American CDL license in order to enter either Mexico or America and Mexican DOT must originate a WEB Site allowing access to information on their registered drivers including their driving records.

K. Mexico requires BA JA and or Federal Mexican plates to travel in their country, a minimum cost of $2,000.00. America should require and issue special plates to Mexican carriers and owner operators. Truck CVSA sticker, Cargo and liability insurance must be current and paid in advance annually in order to be issued these plates. These plates will have a bar code that will be electronically read by Customs, Secondary Truck Stop inspection stations and DOT in order to verify pertinent information's regarding Motor Carrier/Owner Operator, cargo and liability insurance, IRP, IFTA, SSRT, CVSA, BOC-3, and drug testing programs, etc.

L. Mexican Motor Carriers and Owner Operators must belong to IRP and IFTA and pay weight and mile distance tax in those states that require this road tax.

M. Mexican Motor Carriers and Owner Operators must submit Single State Registration Tax (SSRT) to those states that require this dual cargo and liability insurance verification.

N. Trucks must have Commercial Vehicle Safety Alliance (CVSA) inspection stickers issued upon entrance into the U.S. by the DOT and maintained quarterly.
O. If a Motor Carrier or Owner Operator is caught hauling illegal cargo, their authorization to enter the U. S. should be revoked permanently. The argument "I'm not responsible for the actions of my driver" is not effective.
P. Mexican Owner-Operators and Motor Carriers must register themselves and or drivers in a Drug Free Transportation Consortium to include initial drug testing.
Q. Mexican Owner-Operators and Motor Carriers must have on file BOC-3 (Process Agents).
R. Oregon based Motor Carriers are required by law to maintain Workers Compensation on their drivers. Mexican drivers must have equivalent insurance on their drivers.

Additional recommendations I'm sure will be forth coming by OOIDA, ATA, OTA and others.

Very Respectfully,

Bruce Wayne Henion

BRUCE WAYNE HENION

Copy to:

President Johnson, OOIDA

Landline

Medford Turbine