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Motor Vehicle Administration

DEPT. OF TRANSPORTATION

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Maryland Motor
Vehicle Administration
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August 20, 2001

Docket Management Facility
U.S. DOT
Room PL-401, 400
Seventh Street, S.W.
Washington D.C. 20690

Re: Docket No. FMGSA-2001-9800-16
Qualification of Drivers; Exemption
Applications; Diabetes.

Dear Sirs:

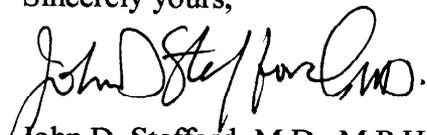
This letter is written in an attempt to obtain the complete set of proposed rules and regulations referencing the above noted topic, which appeared in the Federal Register/Vol. 66, 147/Tuesday, July 31, 2001/Notices.

Although the Federal Register document appeared to be very comprehensive, there are some areas of concern to be visited before we could provide any commentary on the proposed regulations. For example, the definition of; "(4) Has no other disqualifying conditions including diabetes related complications." I am assuming these complications include diabetic retinopathy, diabetic nephropathy, diabetic associated peripheral vascular disease and diabetic associated peripheral neuropathy.

For your information, Maryland MVA recently discontinued its "pilot program" for CDL waivers for diabetic drivers who were insulin dependent. A considerable number of our CDL diabetic waiver population were individuals who had more than a generation of end-organ (s) exposure to their diabetic disease process, as well as other chronic disease conditions which could adversely affect their ability to drive safely. Also, we did not have the guidelines in place for glucose monitoring while performing transportation activities. Disturbingly, some attending physicians would "sign off" on their patients to certify them as safe drivers in spite of highly abnormal Hba1c levels that indicated poor diabetic management control.

At any rate, we would be most appreciative if we could receive the entire set of proposed rule changes.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John D. Stafford M.D.", written in a cursive style.

John D. Stafford, M.D., M.P.H.
Associate Director/MAB

cc: Dr. Chahal

JDS/ps