

December 23, 2002

To Whom It May Concern:

Baggett Transportation Company is pleased to submit comments in response to the Federal Highway Administration's proposed change (Docket 2002-11819) regarding dromedary equipped truck tractor – Semi-trailer as specialized equipment.

Baggett Transportation has partnered with the Department of Defense hauling their AA&E (Arms, Ammunition and Explosives) and other sensitive loads since the 1940s.

Baggett Transportation fully supports the proposed rule change to the 23 CFR 658.13 by the Department of the Army. This change will help speed the flow of munitions to the military during critical times. The change would also help reduce the number of CMV needed to transport military munitions and sensitive material. Baggett requests that one modification to the rule be made.

“The designation would not apply if any other cargo were being carried in either the semi-trailer or dromedary unit.”

These dromedary boxes cannot be readily removed from owner/operators tractor contracted by the various munitions carriers. The DoD has many shipments of sensitive material not classed as AA&E that can be placed in the dromedary unit or the semi-trailer. This would help reduce the number of CMV on the public highways.

In addition Munitions Carriers, from time to time, must also take general commodity loads in order to reposition their equipment for the next AA&E shipment thus making the truck tractor with a dromedary unit susceptible to the fines and detention under the current and proposed regulation. The proposed rule change could require trucks to sit for long periods of time or deadhead long distances placing an undue burden on the owner/operator and or carrier.

Baggett requests that this proposed rule be amended to allow munitions carriers with dromedary boxes to transport DoD FAK freight and/or general commodity freight to reposition their units for the next AA&E load, to help reduce the burden of waiting or empty miles.

Respectfully Submitted
Claiborne Crommelin, V.P. Safety
Baggett Transportation Company