

295498

To: FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION

Subject: Docket ID FMCSA-2004-18940 --/5

I am very much opposed to the use of Electronic On Board Recording Devices to insure the compliance of the Hours of Service Rules for the truck driving industry. The Reason for the opposition is quite simple.

1. These devices make the Driver feel like he/she is a child. We are called Professional Truck Drivers. Professional Drivers do not need a Mother (The EOBRD) to make sure they get their sleep. In fact they resent the thought. What this will do is to drive the good drivers out of the profession to do something else.
2. One of the most precious items in the life of a truck driver is his home time. These devices will decrease that time. This makes for a mad driver and mad drivers are not safe drivers.
3. One of the most dangerous times for a truck driver is right after he comes off home time. The reason for this is simple. There is so much that needs his attention that he will stretch himself/herself to the limit. This means that they may get into the truck to drive when they are tired. With strict enforcement of the rules that these devices will cause drivers will be forced to keep driving when they really want to stop. They cannot afford to loose the time or the money involved.
4. Another problem is that truck drivers are not robots. On two different nights we can get the 8 hrs or so of rest. One day I can go all day with no problems. The other day I will need to stop and take a nap before 10 am, after having started at 6 am. These onboard devices will discourage this nap from happening and you will again have unsafe drivers on the road.
5. Then if you consider the 2002 statistics if you prevented all the truck accident deaths on all US highways, there still would have been 53000 people killed. If I want to correct a problem, then the fastest way to make an improvement is to go after the biggest numbers first. Therefore if you put them in the trucks then make driving rules for the Cars and put the devices in them as well.
6. Then there is my legal right to privacy. These devices do not respect those rights.

If these devices were put into the trucks for the express purpose of learning about safety issues such as has been done by the FAA the OK. If they were installed to help protect the trucking industry from unmerited law suits, then OK. Or if you applied these rules to all vehicles on the road, then OK. But to single out the truck driver who most likely has the largest group of safe drivers in the country is not very wise.

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