

I do not feel that Electronic On Board Recording devices will improve driver safety. My husband and I drive team. We have no objection to the EOBR's because we drive legal now, and, we also stop driving whenever we get tired, even if we have only driven 2 to 9 hours. EOBR's are used more by dispatchers to make sure you drive as many hours as legally possible. Whenever my husband or I get tired, we stop driving. A EOBR cannot tell when a driver is tired! For single drivers, the EOBR will be able to monitor hours driven, however, the EOBR will not be able to distinguish whether the driver is loading/unloading or is really in the sleeper. The Truckdrivers that are forced to load or unload are the drivers who spend 2 to 10 hours on the dock (log the time as sleeper berth) and then are expected to drive the maximum hours allowed to deliver the load on time. We experienced this when we worked for a Moving Company. We were told how to log so we could drive the maximum hours allowed. EOBR's will not stop this practice! I believe to have driver safety, it is necessary for Shippers and/or Recievers to load or unload. If the truckdriver wishes to get paid for loading or unloading, the Shipper/Receivers should be required to note on the Bill of Lading "Driver Load/Unload" and document the number of hours the driver spent doing this type of work. Perhaps they should be required to document the time of arrival and departure. If the driver spends 8 hours loading his truck, and the BOL indicates this, then the DOT officers will know the driver can only legally drive 6 hours. This also will ensure the drivers log legally. This is where most of the abuse is, and it also causes driver fatigue. Currently when stopped by the DOT officers, there is no way for them to truly see howlong the driver has been on duty. They can only see how many hours the driver has been driving (if the driver wishes to log sleeper berth vs on duty-not driving time).

If the driver is not required to be on the dock and are really in the sleeper berth, the shipper/receiver would simply need to note "Driver not required to assist with load". I believe most drivers log illegal because too many shippers/receivers want the drivers to load/unload for free. This helps the Shippers/Receivers keep their expenses down and their profits up. If they can get drivers to use pallet jacks and stack and count and separate loads, the shippers/receivers can reduce the number of employees they have to pay. When the truck driver is forced to load/unload for free, the drivers feel they need to drive the maximum hours so they can get paid for the miles just so they can get a paycheck

The DOT officers have a hard job when they currently review log books. If the Shippers/Receivers were required to note actual times that could be enforced, the DOT officers could easily tell by the Bill of Lading whether a driving was logging legally.

Until Shippers/Receivers are stopped from using drivers as free labor, all of the EOBR's in the world will not help promote driver safety.