

I wish to make a few comments about the new Hours of Service, the Electronic On Board Recorders and Driver Safety.

My wife and I drive Team. With the loading and unloading time delays at the Shippers and Receivers, there is no way we can drive 11 hours apiece each day. It is nice having the option of driving 11 hours if we are not tired, however, there are many times when we stop driving after 9 or 10 hours. A driver must take responsibility and know if and when they are tired. We do get a lot more rest having the required 10 hour rest period. The 34 hour restart is great when we have to sit around for a weekend before we can get a load on Monday.

The Electronic On board Recorders will only be able to monitor hours driving accurately. This device will not be able to record the many hours that drivers are required to sit around at Shippers and Receivers waiting to be loaded and unloaded. There have been many times where I have been dealing with Receivers (especially Walmart) for 6 to 8 hours after our appointment time just to get unloaded. Luckily, by the time I am done dealing with them, it is my wife's turn to drive. If I was a single driver, I would find the nearest truck stop and go to bed. However, I know many drivers feel that after spending hours checking in every hour or so with no pay, they need to drive all night to enable them to earn money to support their families. Even with EOBR's the truck will not be moving and many of the driver's will log these hours as sleeper berth time. We all know that if a person is use to being up all day, they cannot be expected to change their sleeping pattern and stay awake all night to drive. An EOBR will never be able to tell DOT officers or anyone else if a driver is awake and alert or tired.

The only way to eliminate tired truck drivers is to allow them to drive when they are normally awake and require them to sleep during the same hours each day. Shippers and Receivers are the reason truckdrivers drive when they are tired. When a driver normally drives during the day, and then are required to sit around all day to be loaded, it is normally their rest time and the Broker and Receiver are insisting they drive all night to deliver the load the next day. Even with EOBR's it will be too easy for drivers to indicate (log) sleeper berth so they can drive all night, even if they are tired.

Perhaps with the new HOS, each driver should be required to indicate (choose) their work hours. Example - 6 a.m. to 8 p.m. If a driver sits around at a Shipper's until 5 p.m., they would only be allowed to drive until 8 p.m. Their normal stopping work time.

Some driver's can take naps and are alert and can drive. Other drivers need a full 8 hours of sleep. Every driver is different. I believe the number one cause of tired drivers stems from the huge delays experienced at the Shippers and Receivers. Perhaps all Shippers and Receivers should be required to document the arrival time and departure time of the truck drivers on the Bill of Ladings. Until they are held accountable for the delays, there will always be some drivers who drive when they should be sleeping. EOBR's will never correct the situation or the problem of tired truck drivers.

Even with my wife and I driving team, there are times we are both tired and still stop driving just because of the delays we experience.