

**U. S. Department of Transportation
Federal Motor Carrier Safety Administration
Docket Management Facility
400 Seventh Street, SW, Nassif Building
Room PL-401
Washington, DC 20590-0001**

**Annette M. Sandberg
Administrator**

RE: Docket No. FMCSA-2004-18898

Subject: **Comprehensive Safety Analysis 2010 Initiative**

Thank you for the opportunity to comment on the above initiative. The FMCSA has a significant task to conduct compliance reviews as currently structured and to keep our highways safe.

In order to help with this task and improve the safety of our industry we would like to offer some of the following suggestions.

- Suggest FMCSA resources be directed to address unrated carriers rather than repeatedly reviewing carriers with a proven safety record, unless they are subject to a specific safety-related complaint.
- All carriers should be reviewed at least every five years.
- FMCSA should review new –entrant bus companies prior to issuing operating authority.
- Several companies have reviews conducted by DOD audits, MTMC (Military Traffic Management Command). This data should be on file for FMCSA to review and make a determination to conduct a compliance review.
- The rating process should be reviewed and we suggest that t be changed to a numeric system such as 1-5 using the same structure as MTMC.
- Actual safety performance should be a priority in determining if the carrier should receive a compliance review.

- Operating authority should be cancelled with carriers that pose an immediate threat to the safety of the motoring public.
- FMCSA needs to track carriers and flag carriers who lose their insurance and operating authority due to poor safety operations by starting over and re-incorporating and obtaining new operating authority.
- Several states have special divisions of law enforcement that monitor commercial carriers. FMCSA should work with other states as well as states with special divisions to vigorously enforce traffic laws of commercial carriers.
- California and a few other states have special “pull notice programs “ for drivers and the employer receives a report any time the driver is cited for vehicle and or moving violations. FMCSA should encourage all states to have the same program for CDL holders.
- FMCSA should continue to enhance their website that helps customers select a safe carrier.

The above topics are just a few suggestions to help improve the safety on our highways.

Another suggestion is to have all drivers with CDL’s registered in a central data bank that carriers can obtain driving records quickly. Going to the various states to obtain MVR records is all over the spectrum. One central data bank managed by FMCSA or a supporting agency would be very effective for the industry.