

FMCSA-2004-18940-50

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Ted Scott  
1600 W. ...

Yellow Roadway Corporation  
1600 W. ...  
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October 14, 2004

The Honorable Annette Sandberg  
Administrator, Federal Motor Carrier Administration  
400 7<sup>th</sup> Street, S.W.  
Washington D.C. 20590

Dear Administrator Sandberg:

I am writing to invite you and members of your staff to visit our Roadway Express Consolidation and Distribution Center in Carlisle, Pennsylvania.

We would like the opportunity to brief you on the programs in place at Yellow Transportation and Roadway Express to comply with the FMCSA Hours of Service Rules (49CFR Part 395 and 49 CFR 390.5) and driver's record of duty status.

We believe that many aspects of your efforts to develop fair and workable rules regarding electronic on-board recorders (EOBRs) as outlined in Docket No. FMCSA-2004-18940, Electronic On-Board Recorders for Hours-of-Service Compliance may not apply to many of the national and regional unionized Less-Than-Truckload companies.

We propose to give you a tour of our facility and have senior company officials brief you on the following,

- The companies and their national LTL operations,
- Explain the different types of driving done (city dispatch, shuttle, and line-haul operations) and the different ways that equipment and drivers are managed,
- How driver logs are used within the company to ensure hours-of-service compliance,
- How the union "bid-board" works and its impact on driver HOS and compliance, and
- Current and future technologies used to assist in our management of hours-of-service rules.

We anticipate that the tour and briefing will take approximately 2 ½ hours with another 30 minutes for questions and answers.

I will follow-up with you shortly to discuss your availability for the tour and briefing and to answer any questions you may have.

Sincerely,