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U.S. DEPARTMENT OF TRANSPORTATION  
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Docket Management Facility  
U.S. Department of Transportation  
400 7<sup>th</sup> Street SW  
Nassif Building-Room PL-401  
Washington, DC 20590

RE: Docket 18898-Comments -16

To Whom It May Concern:

While I believe the compliance review process is effective, it is also a very cumbersome and costly system to administer. The fact that only about 2% of active carriers are reviewed annually speaks to that. The results of roadside inspections are a true indication of what a carrier is allowing their Drivers to do and how they are maintaining their equipment. If you can come up with a fair system to grade these inspections, they remain a good indicator of what the carrier is doing.

I would also suggest that more emphasis is put on Driver training after a CDL is obtained. When I worked for Mullen Transportation we required all of our Drivers to go through additional training at least every two years. This included such Chapter Topics as: Attitude, Defensive Driving Skills, Adverse Road Conditions, Determining Accident Preventability, Driver Fitness, Regulatory Requirements, Vehicle Conditions, and Backing. This was 1.5 days of classroom with the last ½ day used for Defensive Driving Training in a vehicle. Anyone who had not previously been to the Michigan Center for Truck Safety Skid Pad went there on the 3<sup>rd</sup> day. There is no substitute for training and it does pay off in lower accident rates and expenses-I have witnessed that first hand.

With regard to the hours of service regulations: I do think the new regulations work. They work because they limit the amount of time a Driver can extend his day. That is vital to keep tired Drivers off the road. It is also easier to examine logs under the new regs because most of the Driver improvisation that existed previously in the old regulations has been taken away.

Sincerely,



Thomas J. Qualman  
Safety Director  
TransWay, Inc.  
Holland, MI