

## Peter Casazza - Comments

Document FMCSA-2010-0286-  
ID: 0003

This is comment on [PROPOSED RULE](#): Agency Information Collection Activities; Proposals, Submissions, and Approvals: Request for Revocation of Authority Granted

Docket [FMCSA-2010-0286](#)

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### Comment: October 17, 2010

Peter Casazza Associates Transportation Consultants 3515 East Chestnut Avenue Vineland, NJ 08361-7903 Telephone 856 696 4846; FAX 856 362 5968; e-mail pscasazza@comcast.net Sunday, October 17, 2010 Department of Transportation Federal Motor Carrier Safety Administration 1200 New Jersey Avenue, SE Washington, DC 20590-0001 RE: Federal Motor Carrier Safety Administration. Notice; and request for comments - Docket No. FMCSA-2010-0286 ? Notice of Request to Revise a Currently-Approved Information Collection Request: Request for Revocation of Authority Granted. Comments due on or before October 25, 2010. Federal Register publication Tuesday, August 24, 2010, pages 52053-52054.

My name is Peter Casazza. I am a practicing Transportation Consultant specializing in motor carrier matters with an office at 3515 East Chestnut Avenue, Vineland, NJ 08361. I have maintained this practice in excess of thirty (30) years and have served the needs of approximately seventy (75) five motor carrier and shipper interests during this period of time. I have used Form OCE-46 a number of times on behalf of clients and find it to be an immediate and definitive method for a carrier to revoke their operating authority. I have witnessed cases where carriers wish to discontinue operations, however, they allow their insurance to lapse and have the Federal Motor Carrier Safety Administration (FMCSA) institute a revocation action which ultimately results in their operating rights declared ?Inactive? by the FMCSA. This procedure can take months. In my judgment, OCE -46 is direct and to the point, serves a constructive purpose and should not be discontinued. I am aware that the FMCSA in its ?On-line? website currently provides for an electronic revocation of

operating authorities. In the "Revocation Options" portion of the on-line registration, there are fourteen (14) separate options that a motor carrier can choose depending on what the carrier wants. Thus, at the current time, a carrier, freight forwarder or broker can use one of two methods to revoke its permit(s), certificate(s) or licenses(s). Utilize Form OCE-46 or do it electronically on the FMCSA web site. I find no difficulty in affording the transport industry two choices to accomplish this task. After all, the FMCSA presently allows "new entrants" to register electronically or to forward via mail or courier a copy of the completed application to its offices. However, let's examine the two choices with greater scrutiny. The electronic process on the FMCSA web site requires the use of a credit card and "Pin" number in order to complete the transaction. I can categorically say that none of the thirty (35) five motor carriers and or property brokers for whom I am presently performing some degree of consultation work are aware of the registration process on the FMCSA web site. My consultation practice, amongst motor carriers, consists of smaller entities, and for the sake of identification, are those fleets who operate twenty (25) five vehicles or less. While it may be true, that as a consultant, I can perform the electronic process for them, however, I have run into a number of situations where the use of a credit card is frowned upon by the carrier/broker due to identity theft concerns. The "PIN" number, in a number of cases, has proved to serve as an obstacle since the FMCSA currently requires, in the case of motor carriers, both, a Docket Number (Operating Authority-MC) PIN and a USDOT number PIN. I currently have a number of clientele who still do not have both PIN numbers. I cannot imagine advising a motor carrier client who wishes to discontinue operations immediately, who does not possess the requisite PIN number that it will have to wait 4 to 7 business days to receive it via the postal service. Additionally, in this age of the "do-it-itself craze", a reasonable number of motor carriers for whom I do consultation work choose to do certain tasks themselves. For the reasons set forth in this paragraph, they will not choose to revoke their operating authority(s) electronically. Thus, Form OCE-46, as a self sustaining document presents a sensible solution. It is a well-structured, simplistic form requiring minimal information and notarization. Instructions are provided on page 2 of the form as to where it is to be forwarded. The unsophisticated carrier, freight forwarder or broker comprehends that it is taking the necessary action to have its operating authority(s) revoked and it can do so with relative ease. For all of the foregoing reasons, I respectfully urge continuance of Form OCE-46 in its present format. Respectfully submitted. Peter Casazza

## Peter Casazza - Correction to Comment Previously Submitted: October 25, 2010

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Peter Casazza Associates Transportation Consultants 3515 East Chestnut Avenue Vineland, NJ 08361-7903 Telephone 856 696 4846; FAX 856 362 5968; e-mail pscasazza@comcast.net Saturday, October 23, 2010 Department of Transportation Federal Motor Carrier Safety Administration 1200 New Jersey Avenue, SE Washington, DC 20590-0001 RE: Federal Motor Carrier Safety Administration. Notice; and request for comments - Docket No. FMCSA-2010-0286 ? Notice of Request to Revise a Currently-Approved Information Collection Request: Request for Revocation of Authority Granted. Comments due on or before October 25, 2010. Federal Register publication Tuesday, August 24, 2010, pages 52053-52054. Tracking Number 80b71751. \_\_\_\_\_ My name is Peter Casazza. On October 17, 2010 I submitted comments with regard to the aforementioned proceeding which were posted on October 18, 2010 ? see Tracking Number 80b71751. I have discovered an error in the second sentence of the fourth paragraph of my prior submission. The words ?Revocation Options? were inadvertently used and should have read ?Registration Options?. Thus, the fourth paragraph, in its entirety, should read as follows: I am aware that the FMCSA in its ?On-line? website currently provides for an electronic revocation of operating authorities. In the ? Registration Options? portion of the on-line registration, there are fourteen (14) separate options that a motor carrier can choose depending on what the carrier wants. I trust that this submission will allow the correction of an inadvertent error in my original commentary. Respectfully submitted, Peter Casazza