



U.S. Department
of Transportation

**Federal Motor Carrier
Safety Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

APR 24 2013

Refer to: MC-RRR

Mr. Thomas Gregory Judd
6998 New Mexico Drive
Riverside, CA 92506

Thank you for your comments concerning the Federal Motor Carrier Safety Administration's (FMCSA) Information Collection Activities; New Information Collection Request: Driver and Carrier Surveys Related to Electronic Onboard Recorders (EOBRs) and Potential Harassment Deriving From EOBR Use [Docket No. FMCSA-2012-0309].

This survey collection will aid FMCSA by broadly examining through the collection of survey data the issue of driver harassment. Specifically, it will help us determine the extent to which EOBRs used to document drivers' hours of service could also be used by motor carriers or enforcement personnel to harass drivers and/or monitor driver productivity. The survey will also collect information on the extent to which respondents believe that the use of EOBRs may result in coercion of drivers by motor carriers, shippers, receivers, and transportation intermediaries. FMCSA will publish a supplemental notice of proposed rulemaking on EOBRs and will consider survey results concerning EOBR use by motor carriers, including counter measures or best practices to ensure that EOBRs are not used by carriers to harass or coerce drivers, prior to the issuance of a final rule. FMCSA believes that this study has the potential to identify information that could greatly improve highway safety.

Thank you for taking the time to respond. It is noted in your statement "EOBRs will not solve the safety issue" for the following reasons "most companies only allow drivers 15 minutes to complete paperwork, pretrip and leave the yard." It is your belief for example that this allotted time is inadequate to complete the additional responsibilities drivers have to insure the truck is safe to operate. Also, you state that dispatchers do not take into consideration the many problems which come up in moving the freight resulting in delivery delay. These kinds of statements will aid FMCSA as we review the findings of the survey study.

If you would like a copy of the survey please feel free to contact me at (202) 385-2387.

Sincerely,

Albert Alvarez.
Senior Transportation Specialist
Research Division (MC-RRR)