Jon Edwards - Comments

This is a Comment on the Federal Motor Carrier Safety Administration (FMCSA) Notice: Agency Information Collection Activities: Proposals, **Submissions, and Approvals Driver and Carrier Surveys Related to Electronic Onboard Recorders and Potential Harassment Deriving From Use**

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In 2012, I returned to driving a truck from 15 years out of the industry. EOBR's were in the company trucks that I drove.

The forced us to complete unrealistically all work in a 14 hour window. Whether we were tired or not. You HAD to complete your driving or you were not allowed to do it. No ability to stop and take a 2-3 hour nap. Just how it was.

Twice I was sent messaged in a 3 month window by dispatch wanting to know why my truck wasn't moving. The second time it was to send a text message to wake me up after 10 1/2 hours on a break. I was waiting as long as possible to move to NOT start my 14 hour clock.

Both times I contacted the employer and told them it was harassment and the third time, I would be out of the truck and since they KNEW where the truck was, could come and get it. They never paged me again like that.

I have run long 1000+ runs and you are up 11-12 hours, down 10. You move your clock ahead about 2 hours per day and withing 5 days you are now running nights and sleeping days. Abnormal sleep patterns are common on EOBR.

Now as an owner/operator of a single truck, I am

Due Jun 27 2013, at 11:59 PM ET

ID: FMCSA-2012-0309-0046 Tracking Number: 1jx-85lr-cv5z **View original printed format:**



Document Information

Date Posted: May 29, 2013 Show More Details :

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looking to be forced to spend an additional \$1600 on an EOBR with a minimum of \$75 monthly service charge to comply with this mandate. That's over \$900 annually in additional FIXED overhead to me.

Mechanically, I have had this wiring in my truck and it caused my vehicle operating issues. It made my truck unreliable and difficult to troubleshoot mechanical problems until I took the wiring out of the truck. An additional \$350 maintenance expense I DIDN'T need or would have had if it weren't for the EOBR.