

**INSURANCE INSTITUTE
FOR HIGHWAY SAFETY**

December 15, 2000

The Honorable Clyde J. Hart, Jr.
Acting Deputy Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

**49 CFR Part 395
Hours of Service of Commercial Drivers
Docket No. FMCSA 97-2350**

Dear Mr. Hart:

Pursuant to the Federal Motor Carrier Safety Administration's (FMCSA) request for additional data relevant to the hours-of-service rulemaking, attached is a list of automated recording devices that cost \$500 or less per vehicle. The costs of the electronic recorders on this list are substantially lower than both the estimates in FMCSA's preliminary regulatory analysis and the estimates provided by trucking industry representatives. The Insurance Institute for Highway Safety strongly urges FMCSA to revise its cost estimates to reflect the availability of inexpensive automated recording devices that meet the agency's proposed specifications.

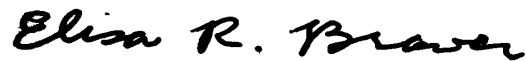
These low costs indicate the economic feasibility of the proposed requirement for tamper-resistant recording devices to monitor adherence to driving hour limits among long-haul commercial motor vehicle drivers. If such a requirement is promulgated, other manufacturers also are likely to produce inexpensive devices to perform this function. The more expensive recording devices have optional features not included in the proposal published by FMCSA; the agency's regulatory analysis should not be based on the costs of devices that go far beyond the proposed minimum requirements for automated recorders.

As described in our comments submitted August 4, 2000, electronic recorders are needed because crash risk significantly increases after 8-10 hours of driving (Campbell, 1988; Frith, 1994; Harris, 1978; Jones and Stein, 1987, 1989; Kaneko and Jovanis, 1992; Lin et al., 1993, 1994; Mackie and Miller, 1978; National Transportation Safety Board, 1995;

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Saccomanno et al., 1995, 1996; Summala and Mikkola, 1994). In addition, the current driving hour limits are frequently violated, in large part because of the well-documented deficiencies of handwritten logbooks (Beilock, 1995; Beilock and Capelle, 1987; Belman et al., 1998; Braver et al., 1992; Hertz, 1991; McCartt et al., 1997; McKane, 1994; Ouellet, 1994). At least one study has reported crash reductions among commercial vehicles equipped with electronic recorders designed to record driving hours (Wouter and Bos, 2000; see August 4, 2000 submission). Requiring tamper-resistant electronic recording devices for interstate long-haul commercial vehicles is a sensible and economically feasible method of improving large truck safety on our nation's highways.

Sincerely,

A handwritten signature in black ink that reads "Elisa R. Braver". The signature is written in a cursive, slightly slanted style.

Elisa R. Braver, Ph.D.
Senior Epidemiologist

cc: The Honorable Rodney Slater
Docket Clerk, Docket No. FHWA-97-2350

Attachment

Vendors of Onboard Recording Devices Costing \$500 or Less

Vendor	Minimum Cost for New Truck	Minimum Cost to Retrofit Truck	Price per Additional Unit	Minimum Software Costs	Comments	Contact
VDO North America	\$300	\$500	\$300	None	Known as digital tachograph. Meets future European standards. Software packages are optional but not required for base model.	540-723-8015
Actia	\$500	\$500	\$500	None	New unit will be out next year and will cost \$300. It will meet the European standards using smart cards and a printer. Cost per unit may increase if Actia does the installation. If a trucking company purchases a large volume, there will be a discount.	219-293-7505
Stoneridge	\$190	\$190	\$190	None	Driver message center is basic model but there are others. May cost up to \$250 depending on programming of unit. Each unit must be programmed to the chassis. Most are custom-built units and price increases with added options.	915-592-5700