

# INSURANCE INSTITUTE FOR HIGHWAY SAFETY

May 5, 2014

The Honorable Anne S. Ferro  
Administrator  
Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Supplemental Notice of Proposed Rulemaking; Electronic Logging Devices and Hours of Service Supporting Documents; 49 CFR Parts 385, 386, 390, and 395; Docket No. FMCSA-2010-0167**

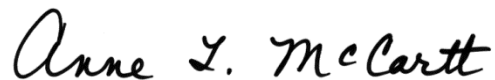
Dear Administrator Ferro:

The Federal Motor Carrier Safety Administration (FMCSA) has requested comments on a proposed requirement for all motor carriers required to maintain records of duty status to use electronic logging devices to monitor drivers' compliance with the hours-of-service rule. These carriers would no longer be required to keep supporting documents reflecting driving time, as this information would overlap with the information from electronic logging devices, but would be required to keep other specified types of supporting documents to document compliance with the hours-of-service rules, including non-driving work time. The proposal spells out measures to address concerns about harassment resulting from the mandatory use of electronic logging devices and includes minimum performance and design standards for the devices.

The Insurance Institute for Highway Safety reiterates our support for an electronic logging device mandate. During the past three decades, we have submitted five petitions to the agency and more than 20 comments calling for an electronic logging device requirement for all heavy trucks. Our research documented the widespread violations of work rules among long-distance truck drivers, the association between work rule violations and dozing at the wheel, and the increasing percentage of trucks already equipped with onboard recorders (McCartt et al., 2008).

We urge the agency to move quickly to publish a final rule.

Sincerely,



Anne T. McCartt, Ph.D.  
Senior Vice President, Research

## Reference

McCartt, A.T.; Hellinga, L.A.; and Solomon, M.G. 2008. Work schedules of long-distance truck drivers before and after 2004 hours-of-service rule change. *Traffic Injury Prevention* 9:201-10.