

**INSURANCE INSTITUTE  
FOR HIGHWAY SAFETY**

January 3, 2005

The Honorable Annette M. Sandberg  
Administrator  
Federal Motor Carrier Safety Administration  
400 Seventh Street S.W.  
Nassif Building, Room PL-401  
Washington, D.C. 20590-0001

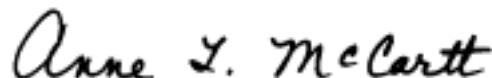
**Hours of Service of Drivers; Supporting Documents  
Supplemental Notice of Proposed Rulemaking  
Docket No. FMCSA-1998-3706**

Dear Ms. Sandberg:

The Insurance Institute for Highway Safety supports the Federal Motor Carrier Safety Administration (FMCSA) proposal that clarifies and defines the supporting documents that motor carriers, including owner operators, must keep to verify the accuracy of drivers' records of duty status. We support the proposed document-based self-monitoring system, the six-month retention requirement, and the use of electronic documents as a supplement to, or in some cases in lieu of, paper supporting documents.

One aspect of the rule should be clarified. FMCSA indicates that a motor carrier may request an exemption from the supporting document requirements, based on the carrier's hours-of-service compliance as shown by the compliance review and the specific request submitted. We believe FMCSA should detail the criteria to be used in evaluating these exemptions, including the extent to which a carrier's reliance on electronic documents will be considered. Carriers that use electronic onboard recorders or other electronic means to document and monitor drivers' work hours should be considered for such exemptions, as electronic systems are far more tamper-resistant than paper-based systems.

Sincerely,



Anne T. McCartt, Ph.D.  
Senior Research Associate

cc: Docket Clerk, Docket No. FMCSA-1998-3706