



Voice of the Recycling Industry™

September 24, 2018

Docket Management Facility
US Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor
Room W12-140
Washington, D.C. 20590-0001

Re: Docket ID FMCSA-2018-0248

Introduction:

The Institute of Scrap Recycling Industries, Inc. (ISRI) submits the following comments to the Federal Motor Carrier Safety Administration (FMCSA) regarding the Advanced Notice of Proposed Rulemaking (ANPRM) Docket Name: Hours of Service Regulations for Drivers.

ISRI represents more than 1300 companies, in 34 countries (of which 737 member companies have US DOT authority). Nationally ISRI has 21 chapters nationwide of companies that process, broker, and consume scrap commodities, including metals, paper, plastics, glass, rubber, electronics and textiles. With headquarters in Washington, D.C., the institute provides education, advocacy, safety compliance, training, and promotes public awareness of the vital role recycling plays in the U.S. economy, global trade, the environment, and sustainable development.

Proposed rulemaking background:

FMCSA seeks public input in four specific areas in which the Agency is considering changes: The short-haul HOS limit; the HOS exception for adverse driving conditions; the 30-minute rest break provision; and the sleeper berth rule to allow drivers to split their required time in the sleeper berth.

Summary of Position:

ISRI supports rules and regulations that increase highway safety (reduce accident frequency and severity). ISRI has been an active supporter of pro-safety regulatory changes at both the state and federal levels over the years.

ISRI recommends the following:

1. ISRI supports expanding the 100 air-mile "Short Haul" exemption from 12 consecutive hours to 14 hours on duty. Working a 14-hour day with breaks included would not place drivers at-risk, and it would not impact driver fatigue. Since drivers take multiple rest breaks throughout the day (driver out of the vehicle waiting to load or unload, etc.), the 30-minute rest break should remain excluded from the short haul exemption.

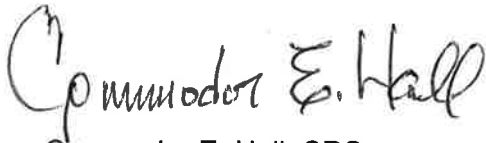
Institute of Scrap Recycling Industries, Inc.

1250 H Street NW, Suite 400 • Washington, DC 20005-5903 • Tel: (202) 662-8500 • Fax: (202) 626-9256 • ISRI.org

2. ISRI supports extending the 14-hour on-duty limitation by two hours when a truck driver encounters adverse driving conditions. Driving an additional two hours to find a safe haven (rest area, truck stop, parking lot) where a large commercial motor vehicle can be parked safely makes sense instead of parking on an entrance or exit ramp near traffic.
3. ISRI has no comment in regards to revising the 30-minute rest break for truck drivers after 8-hours of continuous driving. The majority of ISRI member company drivers operate within a 100 air-mile radius.
4. ISRI has no comment in regards to reinstating the option for splitting up the required 10-hour rest break for drivers operating trucks that are equipped with a sleeper-berth compartment. The majority of ISRI member company drivers operate within a 100 air-mile radius.

We appreciate your consideration on this important issue and we look forward to your response on how to uphold safety and provide needed flexibility for drivers.

Sincerely,

A handwritten signature in cursive script that reads "Commodore E. Hall". The signature is written in dark ink and is positioned above the typed name.

Commodore E. Hall, CDS
Transportation Safety Director
Institute of Scrap Recycling Industries, Inc.

Commodor Hall

From: no-reply@regulations.gov
Sent: Monday, September 24, 2018 2:49 PM
To: Commodor Hall
Subject: Your Comment Submitted on Regulations.gov (ID: FMCSA-2018-0248-0160)



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Agency: Federal Motor Carrier Safety Administration (FMCSA)
Document Type: Rulemaking
Title: Hours of Service of Drivers
Document ID: FMCSA-2018-0248-0160

Comment:
See attached file referencing verbiage:

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Commodor E. Hall, CDS
Transportation Safety Director
Institute of Scrap Recycling Industries, Inc.

Uploaded File(s):

- DOCKET ID FMCSA-2018-0248 (ISRI).pdf

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This information will not appear on Regulations.gov:

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Category: Public Comment(s)

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