

1/11/2008

Docket #FMCSA-2004-19608
Docket Management Facility
U.S. Department of Transportation
Room W12-140
1200 New Jersey Avenue, S.E.
Washington, DC 20590-0001

Re: Hours of Service of Drivers: Interim Final Rule

Dear Sir/Madam:

Fleetwood Transportation Services, Inc supports the Federal Motor Carrier Safety Administration's (FMCSA) December 17, 2007 Interim Final Rule on Hours of Service of Drivers (HOS). We urge FMCSA to retain the 11 hour driving limit and 34 hour restart provisions as published in the Federal Register notice. These HOS regulations have supplied the trucking industry valuable tools to promote driver safety, alertness and performance.

Fleetwood Transportation Services, Inc is a for hire interstate carrier. We currently run about 350 trucks. That is a combination of company drivers and owner operators. Our Forest Products division hauls wood chips, sawdust, shavings, logs, lumber, and veneers. Our National Division hauls oil field products, poles, transformers, and general commodities. We are not a HAZ-MAT hauler.

Since the current HOS were introduced, our DOT recordable accident rate has dropped by 70%.

The 11 hour driving limit has been very beneficial. This provision provides important flexibility for drivers to manage their schedules; particularly in times of unexpected delays such as traffic congestion, and has helped in loading/unloading and other shipper scheduling matters.

All our drivers use the 11 hour driving limits. In October of 2007, The Texas Department of Public Safety conducted a Federal DOT Audit. Our rating was and still is **Satisfactory**.

The pro-safety aspects of the 34 recovery and restart provision are real and it has enhanced the "quality of life" for our drivers. It is an essential part of the rules that adequately allows drivers to obtain an extended period for rest and recovery.

The 34 hour restart is used by our Forest Products drivers and our National Divisions over the road and regional drivers. This is about 60% of our total fleet. The 34 hour restart provides our drivers greater flexibility during the week and allows the drivers to spend more time at home when they are off duty.

In our view the new HOS rules have resulted in improvement in driver health, truck safety and overall highway safety. FMCSA must preserve the rules and the 11 hour driving and 34 hour restart provisions to continue the gains these regulations have provided to Fleetwood Transportation Services, Inc.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Eddie Prather, C.F.S
Director of Safety