

Federal Motor Carrier Safety Administration
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REGISTRATION
2008 JAN -2 A 11:18
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December 23, 2007

Sirs:

As a Commercial Drivers License holder for over eight years and a team driver for that entire eight year period, I wish to thank you very much for retaining the Hours of Service (HOS) as prior to the latest interim, permanent rules; however, I would respectfully request that you consider a simple change to make the HOS much more fitting for team drivers. As teams are able to drive nearly continuously for one or more days consecutively, the individual team drivers are generally required to rest while their partners are driving. This means trying to sleep on a bunk which is continuously in motion, frequently bouncing due to the conditions of the roads over which the truck is moving, and routinely affected by braking action required in response to traffic conditions. These bunk movements are facts which cannot be changed in order to make a team's actual rest needs and actual rest received conform to the current HOS rules.

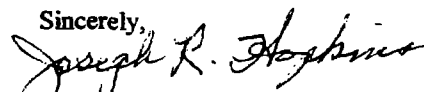
Having been involved in team driving when a five, six, or eight hour split was allowable, I know from experience that it is far, far easier to maintain a safe, rested condition as a team, under the split sleeper berth HOS provisions than it is under the current HOS without the split sleeper berth. I have a BS in Industrial Engineering from Arizona State University (1966). During the pursuit of this degree I took several courses in what is now called human factors engineering. In each of these courses the primary emphasis of the material presented was to make things easier for the person and not to make the person adapt to difficult requirements of a job when not necessary.

The split sleeper berth supports this backbone of human factors engineering, while the eight and two, or ten consecutive hour rest requirements attempt to force our bodies to accept a long rest period which is not practical while trying to sleep in a truck moving over our roadways at highway speeds. This, unfortunately, results in team drivers returning to an on duty driving status for another possible ten or eleven hour driving shift while only having been able to sleep for three or four hours early in their sleeper berth period and having been awake for six to seven hours before beginning to drive again.

Solo drivers do not experience this inability to achieve a normal rest as they are resting in a fully stopped truck under ideal conditions. This makes an unbelievable difference in a person's ability to rest in a sleeper berth. A team driver can normally attain a good rest of approximately five hours immediately after finishing a five or six hour driving shift and then be fully capable of safely driving for another five or six hours while ten or eleven hours of driving stretch the limit of the bodies natural ability and frequently result in a tired condition.

For the reasons stated above and in the interest of safety on the highways, I sincerely request that you reinstate the flexibility of the split sleeper berth for team drivers.

Sincerely,


Joseph R. Hopkins