

Colonel Bill Hitchens Commissioner Georgia Department of Public Safety Motor Carrier Compliance Division P. O. Box 1456 Atlanta, Georgia 30371-1456 Phone: (404) 624-7212 Fax: (404)-624-7299

Deputy Commissioner

Lt. Colonel Don Chastain

Mark C. McLeod Chief Enforcement Officer

February 15, 2007

Docket Management Facility U.S. Department of Transportation 400 Seventh Street, SW., Room PL-401 Washington, DC 20590-0001.

RE: Docket No. FMCSA-2005-23315

This letter responds to the Intermodal Equipment notice of proposed rulemaking published in the December 21, 2006 *Federal Register*. The Georgia Department of Public Safety (Department) is the State Lead Agency for the Motor Carrier Safety Assistance Program, and performs or administers some 90,000 roadside inspections each year, as well as performing Compliance Reviews and New Entrant Safety Audits on several thousand motor carriers each year.

The Department staff believes that the Identification Number proposed should be a U.S. DOT Number as currently issued, and that to say otherwise will only create confusion among carriers and roadside enforcement officials. FMCSA must provide a way to readily capture these U.S. DOT Numbers in both the ASPEN and SAFETYNET software, as well as identify the numbers in the Motor Carrier Management Information System (MCMIS) and its successors.

In addition, FMCSA may want to consider some kind of verification algorithm in the future, where a U.S. DOT Number displayed on a container chassis can be verified against the Reporting marks displayed on that particular unit.

Thank you for the opportunity to comment on this proposal. If you need more information, please contact Capt. Bruce Bugg of the Motor Carrier Compliance Division at 404-624-7226 or by e-mail at obbugg@gsp.net.

Sincerely,

Mark C. McLeod Chief Enforcement Officer

cc: Lee O'Brien, Legal Services Capt. Bruce Bugg