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To: FMCSA

Re: Docket # 2013-0058

This is in response to your question "Are DQ files burdensome". Even this question may be part of the problem, as technically you are only asking about one part of the driver files. Currently this only relates to 8 different documents, however if you consider really what all driver files consist of it is much more than just the eight documents. You also have to have all the info required under the "driver investigation file which includes, drivers written authorization for drug & alcohol testing, previous employee authorization and documentation on whether or not the former employee responds. After all this then you get to the "Confidential file" which includes alcohol & drug testing. So is your question just about "DQ" files only or is it all encompassing and that is what it should be.

Even all this does not include 1-9 forms and local state and federal tax forms.

The answer is it takes way more than 28 minutes per year, at the time of employment it can easily take one hour and then through the year you will be spending time updating medical cards and driver record and drug & alcohol testing.

Bottom line if you do it correctly you will spend at least one & one half hours a year per driver.

Advise if any questions

Thank you

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