

OFFICE TENDERS, INC.

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FMCSA
Re: Docket # 2013-0058

Dear Sir or Madam

My interpretation is that drug & alcohol testing are included in the question "Are DQ files burdensome".

The second qualifier I would use is that referring to the number of "documents" required for a DQF does not account for the number of pages involved for an individual document. We are a company that provides FMCSA Compliance Support and on-going maintenance-support for over 700 individual files.

We are not in the business of selling forms so over the past 15 years have created forms that include what the FMCSA requires and combines information/forms wherever possible. Even doing this, the volume of paper required for a DQF requires redundancy of information in several documents. We have approximately 18 documents required per driver. Add about 10 more documents for the "company" itself when they are first establishing their compliance requirements.

In the "perfect" circumstance, it takes approximately 1 hour to set-up a new driver if they have all required information, including all previous employment history. Annual "maintenance" of a DQF (including random testing documentation) can take another 30-60 minutes.

Add to all of the above the time required for just staying on top of all the regulations to be sure that the DQF and Drug/Alcohol Programs are modified as needed to stay current.

Yes, DQ files are overly burdensome. I would hope that if reduction of this burden is seriously considered, that the FMCSA actually involve safety personnel and those of us who do this type of work to: 1) see how long this actually takes and 2) consider eliminating redundancy and the volume of paper.

Thank you for asking,

Ann Weiler McMahon
President