

## Comment

July 11, 2014

The Honorable Anne S. Ferro, Administrator  
Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue SE  
Washington, DC 20590

RE: Docket Number FMCSA-2014-0192

Dear Ms. Ferro:

I would like to thank the Federal Motor Carrier Safety Administration ("FMCSA") for inviting the industry to comment on the "Motor Carrier Records Change Form" being discussed in accordance with the Paperwork Reduction Act of 1995.

DOTAuthority.com is a private consulting firm that is one of the premier private agencies for start-up motor carriers looking to acquire their own operating authority. Among the wide variety of filing services offered are DOT & MC Number applications, UCR Registration, and HAZMAT registration. Specific to this proposal, DOTAuthority.com helps motor carriers that are looking to update the name and/or address on their MC and DOT number record and we file petitions for reinstatement on inactive authorities and petitions for reconsideration of dismissed applications.

I am writing to offer this comment to the docket and advise you that DOTAuthority.com fully supports the proposal to streamline the way changes are collected by the Office of Registration and Safety Information.

We ask that in order to avoid confusion in regards to who is submitting the form, that in addition to entity/representative the form should also state 'agent'. This would be in accordance with the FMCSA's existing Frequently Asked Questions (FAQ) found at: <http://www.fmcsa.dot.gov/faq/i-do-not-have-credit-card-can-i-use-someone-elses-credit-card-apply-usdot-number> as well as 49 CFR 365 (<http://www.ecfr.gov/cgi-bin/text-idx?SID=63a3e958e356cae74ce761f0e28a7b61&node=49:5.1.1.2.8&rgn=div5>).

As you know, it has been the policy of the FMCSA for years to allow what essentially constitutes a petition for reconsideration of dismissed applications up to one year from the date of the dismissal to enable the motor carrier to avoid having to pay the \$300 application a second time. We believe the change form should address this issue.

We offer the following information in response to the specific questions posted in the Federal Register on June 27, 2014:

1) Whether the proposed collection is necessary for the performance of FMCSA's functions. DOTAuthority.com believes that this document would greatly simplify the process of getting the FMCSA correct and up-to-date information on motor carriers. Therefore, we believe that this proposed collection process is necessary for the performance of FMCSA's functions.

2) The accuracy of the estimated burden.

We have no reason to believe that the estimated burden identified in the register is in any way inaccurate.

3) Ways for FMCSA to enhance the quality, usefulness, and clarity of the collected information.

It is our opinion that the quality, usefulness, and clarity of the collected information has been optimized in this proposal.

4) Ways that the burden could be minimized without reducing the quality of the collected information.

Due to the already low burden cited, we do not see a way to minimize it without risking the quality of the proposed document.

Thank you again for allowing us to comment on this proposal, which will make for a better and more efficient data collection system.

Sincerely,

/s/James P. Lamb  
President, DOTAuthority.com