

Federal Motor Carrier Safety Administration
1200 New Jersey Ave., SE
Suite W60-300
Washington, DC 20590

COMMUNICATION
BOOKETS

2008 JAN -3 P 12:10

596 E. Lakeshore Dr.
Double Springs, AL 35553
Wednesday, Jan 2, 2008
205-272-1912

Sirs:

I wish to thank you for establishing the Hours Of Service (HOS) as was recently established. As a Commercial Driver for over eight years, I appreciate the 34 hour restart and I see no difficulty with the optional 11th hour of driving. As a team driver, though, I feel that the current HOS disregard a need which we team drivers have for flexibility in our on duty driving time. Under the previous split sleeper berth HOS system, we could rest as required by our "body clock" and we were able to respond to the body's needs for rest, so long as we maintained at least 10 hours of rest in each two consecutive sleeper berth periods. This system is much more advantageous to teams than the inflexibility of the current eight and two or ten hour consecutive rest periods.

The reasons for reinstating the flexible split sleeper berth that I have heard from numerous other team drivers as well as those that I have experienced on my own are:

1. It is extremely difficult to sleep in even the best new sleepers for any extended period on many of our highways (interstates included) due to their deteriorated conditions. For a single driver, this is no concern as their rest periods are always in a stationary truck sleeper.
2. With the truck constantly in motion during a team driver's rest period, the inadvertent braking and accelerating as well as turns and necessary noises such as engine braking, citizen's band radio reports on traffic hazards, etc., as well as all other traffic distractions such as horns and screeching tires add to the distractions from sleep for team drivers. Again, these are not nearly such concerns for the single driver sleeping in a stopped truck's sleeper.
3. As my husband and I haul primarily government contracted loads requiring continuous surveillance, if our truck is called into a weigh station or requires fueling during one of our rest periods, other federal requirements necessitate that the resting driver leave the sleeper berth to sit in the cab and monitor our load while the current driver goes into the weigh station or refuels the truck and enters the fuel stop office to sign for the fuel and obtain a receipt.
4. Due to the above reasons, it is terribly difficult to sleep for a full eight to ten hour rest period, particularly early in a trip requiring several ten or eleven hour driving periods, such as a coast to coast expedited load. If the load is picked up in the morning, the first team driver assists in the loading and then begins the trip. The first driver can usually complete the loading supervision or observation and still drive for ten to 11 hours. If the second driver had a full night's rest the night before the trip begins, it is difficult for them to sleep until near the end of the first driver's shift. This leaves the second driver facing ten hours of driving with little, if any fresh rest.

For the above stated reasons, based on my driving experiences, I ask that you consider adding the split sleeper berth provision to the current HOS. I feel that this addition would greatly improve the safety of team operations in the country. I fear that the current HOS could result in team catastrophes if unchanged. Thank you very, very much for your consideration.

Sincerely,



Barbara Hopkins