

Farris Brothers, Inc.**Custom Harvesting**

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Federal Motor Carrier Safety Administration

Department of Transportation

Docket Management Facility

Room W 12-140

1200 New Jersey Ave, SE

Washington DC 20590

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Docket ID Number: FMCSA-2007-27748

Dear Sirs,

I am a custom harvester and a member of US Custom Harvesters Inc., our trade organization. These proposed rules will put most harvesters out of business. Our organization worked with a driver training school in the mid-90's that only produced 5 drivers in 3 years. Your one size fits all approach to driver training has been a disaster for our industry.

In my operation trucks are rarely driven over 20000 miles in one year. Less than 5000 miles are even on paved roads. We have a different type of driving and hazards that we need to train our drivers to handle. We are already spending more time training our drivers than you are requiring in this proposal but you are taking away my right to train my own employees.

My work is seasonal and we usually harvest from mid May through November. We do not have any year-round employees except for my family. Due to the nature of our driving we have found that we have better drivers if we do our own training. Experienced drivers are not available to do seasonal work and the drivers that are available come with too many bad driving habits and are not very trainable when it comes to off pavement driving. As custom harvesters we are entry level employers. Most of our employees use this job as a stepping-stone to gain the skills they need for their chosen careers and to earn money to further their educations.

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My personal observations seem to indicate that the best drivers had someone to mentor them when they started their careers. Many drivers had their start working for harvesters or farmers who can closely supervise them in a rural environment doing short hauls to farm storage or to the local elevator. The local elevator is usually the closest facility with railroad service. The exemption for custom harvesters found in 49CFR391.2a is very narrowly defined. We are only allowed to transport grain from the field to the first point of unloading and move equipment and supplies to farms where we work. Due to weather conditions and the uncertainty caused by weather factors the commercial trucking companies are not available to do the grain transportation from the field. The heavy trucks that I use are designed to handle the off road driving and do not work well to transport grain over long distances. We not only train our drivers to operate our type of equipment we also structure our training to the individuals abilities. This can be done when you only have to train a small number each year. We usually train 4 to 6 drivers each year. A very small number of new drivers come from accredited programs. The driver shortage is already a problem in the trucking industry and these requirements will only add to this shortage. Can I accredit my training program in a cost effective manner? I need to do my training in April and the nearest accredited program is over 150 miles from my home.

FTDI has lobbied for years for a mandate that all CDL drivers have to be trained by one of their member institutions. Do they have data on how many of their graduates are still driving for the same carrier after 1 year? You know that these schools train 10000 drivers each year but we need over 50000 new drivers each year. The system that you are proposing cannot supply the needed drivers. Almost everything that we consume travels at some point by truck. A driver shortage will hurt our whole economy and drive up the cost of most items that we consume. FTDI's member institutions will profit from this requirement but they cannot show that their graduates are as safe as other entry level drivers.

I also have a problem with carriers that want a piece of paper in their file that shows an entry level driver has this training so they do not have to do any additional training. When we hire an entry level driver we have a duty to the driving public and a moral obligation to our employees to ensure that our drivers can safely operate the equipment entrusted to them. I do not understand why you want to take away my duty and right to train my own drivers and impose a more costly training program on me. I can see large carriers using these programs to help train their entry level drivers but those of us that are in speciality fields should be able to train for our type of driving without training them for some potential future employer.

Your study did not identify any statistically significant difference between trained and untrained drivers with regard to crash frequency. You also found no statistically valid relationship between specific types and amounts of training and crash rates. I assume that the drivers that are considered untrained are the ones that were trained by employers and not by accredited institutions. The system that is proposed here will not improve my safety and it may cause us to be less safe. Please do not force an unproven system on us.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Richard G. Farris".

Richard G. Farris