

**From:** [Tony Justice](#)  
**To:** [Regal, Kelly \(FMCSA\)](#); [Robinson, Pearlie \(FMCSA\)](#); [MCPD \(FMCSA\)](#)  
**Cc:** [DeLorenzo, Joseph \(FMCSA\)](#); [Mahorney, Bill \(FMCSA\)](#); [Bonini, Kyle \(FMCSA\)](#)  
**Subject:** FMCSA-2019-0023: Additional Information  
**Date:** Tuesday, May 14, 2019 9:58:18 AM

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Hello Kelly and Pearlie!

My name is Andrea Marks. I am the Director of Communications for an organization called TruckerNation. We have had the extreme pleasure of working with the Compliance and Enforcement Division and Administrator Martinez's office on the current Hours of Service rulemaking. Our submitted petition was one that was considered in the Advanced Notice of Proposed Rulemaking (ANPRM).

We keep a very close eye on the Federal Register where FMCSA is concerned and we recently made a comment on the Information Collection Request titled Hours of Service Regulations (FMCSA-2019-0023). Since we made our comment a few more articles citing anecdotal data regarding the time it takes to complete a daily Record of Duty Status (RODS) have been published. I wanted to send them over to you so they might be included in the public record for this ICR.

[https://www.overdriveonline.com/erroneous-status-switch-to-on-duty-driving-while-parked-mark-kirbysons-latest-eld-issue/?utm\\_medium=single\\_article&utm\\_campaign=site\\_click&utm\\_source=in\\_story\\_promotion](https://www.overdriveonline.com/erroneous-status-switch-to-on-duty-driving-while-parked-mark-kirbysons-latest-eld-issue/?utm_medium=single_article&utm_campaign=site_click&utm_source=in_story_promotion)

<https://www.overdriveonline.com/faulty-speed-sensors-ground-wires-empathy-on-customer-service-issues-readers-respond-to-one-owner-ops-eld-issue/>

This article is older but still relevant: <https://www.overdriveonline.com/a-malfunction-junction-where-elds-meet-hours-enforcement-owner-operator-jon-hoses-oos-story/>

Best,

***Andrea K. Marks***

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