

# Joint Poultry Industry Safety & Health Council



***Filed Electronically May 23, 2011***

May 23, 2011

Ms. Anne Ferro  
Administrator  
Docket Management Facility  
Federal Motor Carrier Safety Administration  
U.S. Department of Transportation  
West Building, Ground Floor Room W12-140  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590-0001

RE: Docket No. FMCSA-2010-0167  
Proposed Rule Requiring Electronic On-Board Recorders  
76 Fed. Reg. 5537-5555 (February 1, 2011)

Dear Ms. Ferro:

The U. S. Poultry & Egg Association, the National Chicken Council and the National Turkey Federation are non-profit trade associations representing the producers and processors of chickens, turkeys, other poultry and eggs and affiliated industry suppliers. Our associations appreciate the opportunity to submit these comments on the proposed rulemaking requiring Electronic On-Board Recorders (EOBRs) published in the Federal Register on February 1, 2011.

Many of our members have installed EOBRs in their fleets and enjoy the benefits of the technology including enhanced recordkeeping and other fleet management tools. However, many other members continue to successfully utilize paper logs to monitor and comply with hours of service regulations and cannot currently justify the expense of installing electronic recorders.

Our associations oppose this proposed rule mandating the installation of EOBRs. The proper use of paper logs currently allow motor carriers to comply with the hours of service regulations and mandating expensive and unnecessary technology will not guarantee a higher level of compliance. In addition, the April 5, 2010 rule issued by the Agency already requires EOBRs for motor carriers who are found to have a high rate of hours of service violations and this current proposed rule simply adds more costs to carriers who have proven themselves capable of complying with the current regulations at a high level. We do not believe that motor carriers who successfully monitor hours of service with paper logs should be required to incur the expense of electronic recorders.

Thank you for your time and attention to this important matter. Now is not the time to impose new regulations that would increase the cost of conducting business for many firms across the country while not generating significant improvements to motor carrier safety.

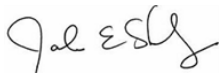
Sincerely,



Joel Brandenberger  
President  
National Turkey Federation



Michael J. Brown  
President  
National Chicken Council



John Starkey  
President  
U.S. Poultry & Egg Association