

1300 L Street, N.W.
Washington, D.C. 20005
December 12, 2005

Annette M. Sandberg, Administrator
Federal Motor Carrier Safety Administration
Document Management Facility
U.S. Department of Transportation
400 Seventh Street, N.W.
Nassif Building, Room PL-401
Washington, D.C. 20590-0001

RE: Docket Number FMCSA-2005-22660

Dear Ms. Sandberg:

I am opposed to the Federal Motor Carrier Safety Administration (FMCSA) granting an Hours-of-Service (HOS) waiver to the United States Postal Service acting as a surrogate for the National Star Route Contractors Association who previously had this request rejected. The United States Postal Service is requesting the FMCSA to allow various Star Route Contractors to operate under HOS and safety conditions far inferior to the conditions that they impose on their own employees and equipment. Under normal operating conditions (excluding December), Postal Vehicle Operators are precluded from operating in excess of 12 ½ hours per day including breaks and split shifts. It is without additional liability and for operation reasons that this request is made on behalf of highway contractors.

As a postal truck driver for 20 plus years, I have first hand knowledge that highway contractor's equipment and safety standards pale in comparison to the United States Postal Service.

I have witnessed Star Route equipment so defective that drivers have had to substitute plastic buckets for broken seats in order to operate the trucks.

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I have witnessed Star Route drivers who work for small companies that are not mandated for Drug and Alcohol Testing to have drivers arrive at Postal facilities so drunk that Postal Officials have refused to load their trucks with mail.

Because many of the Star Route companies do not pay their drivers for down time between runs, the drivers are forced to augment their income driving for other companies and industries during the splits. To grant the Hours-of-Service waiver would simply extend the total operating time. The safety driving record for the Star Route Industry appears to be considerably worse than the United States Postal Service. Among the worse driving accidents experienced transporting mail has been by Star Route drivers in inferior equipment and on extended hours of service.

I urge that the FMCSA reject this request for Hours-of-Service exemption and continue in the direction of safety regulations that help ensure safe roads and highways for our families and the entire millions of Americans who could be affected by this request.

Sincerely,

A handwritten signature in cursive script that reads "Michael O. Foster".

Michael O. Foster