

This action by the USPS should be rejected for many reasons. First, this is the same basic exemption that the Star Route Association made previously that was denied. In the letter to the National Star Route Contractor Association the FMCSA stated: "FMCSA compared the relief sought by the Association to the core goals in the hours-of-service rulemaking: improved safety, more opportunity for rest, movement toward schedules closer to the body's 24-hour clock, practicality, uniformity and enforceability. After careful consideration of all available factual information, including the issues raised by the Association, we have concluded the relief sought in the petition is not consistent those goals and must be denied." This is backed up by the DOT report Short-Haul Trucks and Driver Fatigue (FHWA-MC98-0 16 dated September 1997) which clearly states that most TIFA (trucks involved in Fatal Accidents) occurs between 4 and 6 am with a second spike in fatalities between 4 and 5:30 pm. These are the very hours that the Postal Contractors would be operating their vehicles. They would be operating these trucks in residential neighborhoods and placing the safety of our children at jeopardy.

These drivers do not always rest in between their split shifts. I have personally witnessed a Florida Postal manager testify under oath that these drivers generally get part time jobs during their so called rest period. That means that the USPS knows and has no problem with their contract drivers working 16 to 18 hours a day. What could result in more driver fatigue and jeopardize the goal of improved truck safety more?

I also feel that the USPS has no right to ask for an exemption for privately held companies. These companies may not want or need this exemption and the USPS is now trying to force it on people and companies regardless of what that company's need or desires for an exemption are. Can I ask for an exemption for UPS? I think not. I ask you not to grant the Star Route Association and the USPS a second bite of the apple and deny this exemption. Please do not jeopardize the safety of our neighborhood streets so the USPS can make a few more dollars.