

377772

Royster Enterprises Inc

*P.O. Box 400
Ashland, Al 36251*



FILE OF REGISTRATION
CARRIERS

2005 DEC 15 P 2:35

December 14, 2005

U.S. DOT
Mail Docket Management Facility
400 Seventh St. SW
Nassif Building Room PL 401
Washington, D.C. 20590-0001

Agency: Federal Motor Carriers Administration
Docket # FMCSA 2005-22660 - 139

My name is Randall H. Royster and I represent 2 companies that contract mail transportation for the U.S. Postal Service. These companies are named Royster Enterprises Inc. and RaCo Services, both located in Ashland, Alabama. They transport U.S. Mail out of Atlanta, GA, Birmingham, AL, Montgomery, AL and Pensacola FL to various locations.

Both companies have out-standing safety records. We began hauling mail in 1973 and operated under the old rules with excellent safety records.

Under the new rules; we were forced to hire approximately 12 part-time drivers. We had to reduce the hours worked on the full-time employees, in order to comply with the rules that went into effect on January 4, 2004.

Our company has been forced to purchase autos and mini-vans in order to relay drivers to different points along our mail routes, in order to maintain compliance. This has cost numerous dollars with no change in our safety ratings.

Our drivers work split shifts, usually 3 or 4 hours in the A.M. and 3 or 4 hours in the P.M. The drivers are home daily and are able to sleep at home in their on beds. In order to maintain compliance, a couple of drivers would be required to spend time in the sleeper-berth at home in their on yard, as our drivers are allowed to drive the trucks or tractors to their home location.

Most of the drivers never work over 8 hours per day. This actually allows them 16 hours at home daily or at a location where rest could be obtained. For example, a driver would work no more than 4 hours, could rest 8 hours, either at home or at a facility. He then would report back to work for 4 hours and then have 8 more hours off-duty at home. They usually never work (not all driving) more than 10 hours per day.

The percentage of this work is all within a 100-mile radius, from the beginning to the end. These drivers do the same thing every single day. Drive the same highways and service the same postal facilities. This is a very consistent routine for them.

One of our employees has been doing the same thing, same route and same routine for over 30 years. The only blemish on his record was running over a deer at night. This particular employee was forced to reduce his work hours from 8 hours per day to 6 hours per day in order to comply with the new rules. By the way, he ran over the deer, while complying with the new rules.

I have attached, data from the safety council, that was gathered under the old rules, that proved that our industry, was the best in the country of accidents per 1 million miles.

Under the old rules, we had several years of perfect accident records with the National Safety Council. We had less than 2 accidents per 1 million miles for more than 10 years.

This has not been the case under the new rules. With the training of sub and part-time drivers, it has been the opposite. Accident ratios are up and not even close to a perfect year.

Consideration for this exemption is very important to our industry and the Postal Service. Please understand that what we do is not a general over the road type trucking entity. The old rules are better fit for our business.

Sincerely,

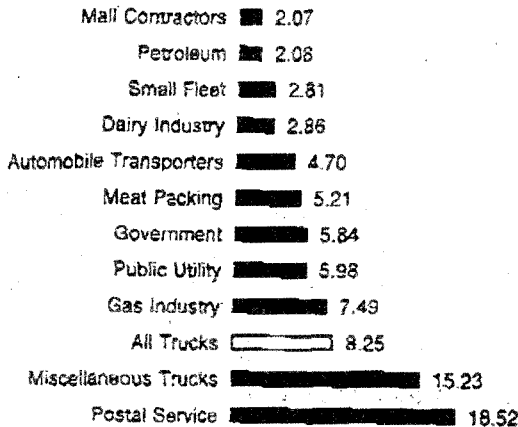


Randall H. Royster
President
Royster Enterprises Inc.
RaCo Services

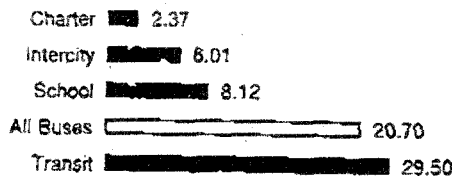
Cc: S. Maraney NSRMCA
J.D. Young U.S. Postal Service
R. Sykes U.S. Postal Service

National Safety Council Announces 1988 Fleet Accident Rates By Type of Vehicle and Operation

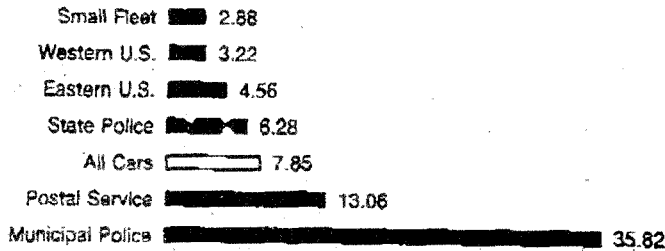
TRUCKS



BUSES



CARS



Source: Based on information submitted to the National Safety Council by participants of the National Fleet Safety Contests. Rates are accidents per 1,000,000 miles. These rates should not be interpreted as representative of the industries listed. Accidents are reported according to the guidelines of the National Fleet Safety Contest Rules.

CPI COLUMN

If you wish an adjustment to your contract rate and the comparison period was from June 1, 1988 to December, 1988, the computation of those items limited to the CPI index percentage change should be as follows:

Divide the CPI of the prior month to the effective date of the adjustment by the CPI index for the month prior to the start of the comparison period which in this case would be May, 1988. The results of this division multiplied by the item amount shown in column III of last approved cost statement is the allowable adjusted amount for that line item.

EXAMPLE:

Effective date of adjustment—December, 1988, comparison period started—June, 1988.

(Month prior to comparison period) May, 1988
CPI=116.2

(Month prior to effective date) November 1988
CPI=119.0

Divide May — 116.2 into November — 119.0 = 1.02409. 1.02409 times last approved line item cost (\$100.00) = \$102.41 new allowable amount for the line item.

Month & Year	CPI	Rebased
December, 1985	323.4	108.6
January, 1986	324.3	108.9
February, 1986	323.2	108.5
March, 1986	321.4	107.9
April, 1986	320.4	107.6
May, 1986	321.4	107.9
June, 1986	323.0	108.4
July, 1986	322.9	108.4
August, 1986	323.4	108.6
September, 1986	324.9	109.1
October, 1986	325.0	109.1
November, 1986	325.4	109.2
December, 1986	325.7	109.3
January, 1987	327.7	110.0
February, 1987	329.0	110.5
March, 1987	330.5	111.0
April, 1987	332.3	111.6
May, 1987	333.4	111.9
June, 1987	334.9	112.4
July, 1987	335.6	112.7
August, 1987	337.4	113.3
September, 1987	339.1	113.8
October, 1987	340.0	114.1
November, 1987	340.4	114.3
December, 1987	340.2	114.2
January, 1988	341.0	114.5
February, 1988	341.6	114.7
March, 1988		115.1
April, 1988		115.7
May, 1988		116.2
June, 1988		116.7
July, 1988		117.2
August, 1988		117.7
September, 1988		118.5
October, 1988		118.9
November, 1988		119.0
December, 1988		119.2
January, 1989		119.7
February, 1989		120.2
March, 1989		120.8
April, 1989		121.8
May, 1989		122.5
June, 1989		122.8
July, 1989		123.2
August, 1989		123.2
September, 1989		123.6
October, 1989		124.2
November, 1989		124.4
December, 1989		124.6



A Western Full House
Western Region Contractors pack the meeting room at the recent region Joint meeting with the USPS. The session was mutually effective with much new information discussed and local problems identified and the resolution begun.

Happy President's Day—February 19