

December 15, 2005

Docket Management Facility  
United States Department of Transportation  
400 Seventh Street SW  
Nassif Building, Room PL-401  
Washington, DC 20590-0001  
RE: Docket No. FMCSA-2005-22660

I am writing on behalf of the Texas Association of Star Route Mail Contractors regarding the DOT's new hours of service requirement. Our association represents many individuals and companies within the state of Texas who contract with the United States Postal Service. This new requirement presents a number of issues and hardships for Texas highway mail contractors, as well as the Postal Service. Some of the facets involved are scheduling, personnel hardships, financial burdens, and safety issues.

#### Scheduling that requires more drivers

Many companies have highway mail routes that require split-shifts, operating early morning and late afternoon hours. Most of these routes are fairly short distances with several pickups or deliveries between. Before the hours-of-service change went into effect, one driver could legally operate both shifts.

#### Financial burden for companies and drivers

With the new requirement, a driver can legally operate only one shift. It creates a hardship on the driver and the company. The driver receives only four to five hours of pay for his shift. A company is required to hire twice the number of drivers just to cover an eight- to ten-hour day. With a serious driver shortage and a minimum number of hours to offer, this creates a real hardship.

#### USPS and public safety issue

From the Postal Service standpoint on these types of contracts, they must clear twice the number of drivers for postal badges. This forces the Postal service to give access to the mail and Postal facilities to twice the number of individuals. This is a much bigger threat to public safety than having one driver work a split-shift.

Mail contractors have a proven track record as being one of the safest in the transportation industry. Allowing the USPS an exemption on the hours of service would greatly benefit all parties involved. I believe you can clearly see that these type operators don't fit into the same category that applies to the long-haul transportation industry.

Sincerely,

Billy Williams, President