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U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001.

August 31, 2018

Re: Comments on Revising Current Hours-of-Service Regulations for Interstate Truck Drivers; Docket Number FMCSA-2018-0248

The American Loggers Council is a 501(c) (6) trade association representing professional timber harvesters and log truckers in 34 States across the U.S. We are the national association of State and Regional logging associations.

We appreciate the opportunity to provide comments on the proposed rulemaking, Docket Number FMCSA-2018-0248 that requests comments in four specific areas that include two that we feel are very important to our industry.

1. Under the current procurement and delivery system that our industry operates under, the majority of our operators fall within the 100 air mile “short haul” exemption allowing us to continue the use of log books versus Electronic Log Devices, yet the hours of service rule still adversely impacts our operations. We often experience longer than average detention times at the receiving facilities for our products, and as a result, run out of hours before we are able to deliver the needed volumes on short hauls necessary to keep our operations profitable.

The average truck hauling into a mill needs to deliver 3 loads per day, but with issues surrounding full inventories and slow turn times in the mill, that often cannot happen under the current 12 hour on-duty regulation. While trucks are sitting in parking lots waiting to be unloaded, their time keeps running. We would like to see the current 12 hours on-duty expanded to 14 hours on-duty given that many of the hours are spent waiting in lines to be unloaded and we are not being paid for detention time and are not able to afford adding additional drivers to our payrolls, making it tough for many of those we represent to stay in the log/pulpwood/chip hauling business.

2. We would also like to see the definition of adverse driving conditions include those times when trucks are being detained by other third party organizations which are not allowing them to make their needed deliveries. That would allow us to tie back into the need for extending the proposed 14 hours on-duty status above for an additional two hours when a truck driver encounters adverse driving conditions, including detention time at the mills.



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3. Our industry generally does not require drivers to drive for a continuous 8 hours due to the short haul nature of the industry, so the 30 minute break after 8-hours of continuous driving is not a issue for us. The drivers can get their breaks in either while being loaded in the woods, or sitting in the mills waiting to be unloaded.

The culture of our industry is such that we perform much like our friends in the agricultural community, yet we are not recognized by the FMCSA or DOT as an agricultural producer. We have crops that we are harvesting that must be delivered to the processing facilities in a timely manner, yet for all intent and purposes, we are seen as an industrial activity instead of an agricultural activity. We firmly believe that the logging industry should be treated as an agricultural activity, and that all exemptions enjoyed by the agriculture industry should include the timber harvesting industry.

Thank you again for the opportunity to comment, and please feel free to reach out to us should you require additional information.

Sincerely,

A handwritten signature in black ink that reads "Daniel J. Druitor". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Daniel J. Druitor
Executive Vice President for the
American Loggers Council