



Filed Electronically May 23, 2014

May 23, 2014

Ms. Anne Ferro
Administrator
Docket Management Facility
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
West Building, Ground Floor Room W12-140
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590-0001

RE: Docket No. FMCSA-2010-0167
Proposed Rule Requiring Electronic Logging Devices
79 Fed. Reg. (March 28, 2014)

Dear Ms. Ferro:

The U. S. Poultry & Egg Association, the National Chicken Council and the National Turkey Federation are non-profit trade associations representing the producers and processors of chickens, turkeys, other poultry and eggs and affiliated industry suppliers. Our associations appreciate the opportunity to submit these comments on the proposed rulemaking requiring Electronic Logging Devices (ELDs) published in the Federal Register on March 28, 2014.

Many of our members have installed ELDs in their fleets and enjoy the benefits of the technology including enhanced recordkeeping and other fleet management tools. However, many other members continue to successfully utilize paper logs to monitor and comply with hours of service regulations and cannot currently justify the expense of installing electronic recorders.

While we understand that Congress required that FMCSA mandate the use of ELDs in the July 2012 highway reauthorization law, the majority of our members continue to oppose this proposed rule. The proper use of paper logs currently allow motor carriers to comply with the hours of service regulations and mandating expensive and unnecessary technology will not guarantee a higher level of compliance. In addition, the April 5, 2010 rule issued by the Agency already requires ELDs for motor carriers who are found to have a high rate of hours of service violations. The currently proposed rule simply adds more costs to carriers who have proven themselves capable of complying with the current regulations at a high level. We do not believe that motor carriers who successfully monitor hours of service with paper logs should be required to incur the expense of electronic recorders.

Thank you for your time and attention to this important matter. Now is not the time to impose new regulations that would increase the cost of conducting business for many firms across the country while not generating significant improvements to motor carrier safety.

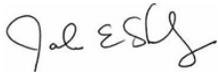
Sincerely,



Joel Brandenberger
President
National Turkey Federation



Michael J. Brown
President
National Chicken Council



John Starkey
President
U.S. Poultry & Egg Association