



Owner-Operator Independent Drivers Association

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August 5, 2020

The Honorable Jim Mullen
Deputy Administrator
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # FMCSA-2020-0076 “2020 Trucking Safety Summit”

Dear Deputy Administrator Mullen:

The Owner-Operator Independent Drivers Association (OOIDA) is the largest trade association representing the views of small-business truckers and professional truck drivers. OOIDA has more than 160,000 members located in all fifty states that collectively own and operate more than 240,000 individual heavy-duty trucks. OOIDA has represented the interests of owner-operators and professional drivers for over 47 years. We were created by truckers, we are led by truckers, and no other organization participating in the 2020 Trucking Safety Summit knows truckers like we do.

My name is Lewie Pugh. I’m the Executive Vice President of OOIDA. Before working at OOIDA, I drove truck for nearly 23 years with 2.5 million miles of safe driving. And before that, I drove truck in the U.S. Army. My entire career has been devoted to trucking and I still have a CDL.

OOIDA actually participated in the 1995 Federal Highway Administration Trucking Safety Summit in Kansas City. Many of the issues we identified then will sound familiar – poor working conditions, overzealous enforcement, and inadequate driver training, just to name a few.

Hopefully this year’s summit will discuss solutions that will actually improve highway safety and make the trucking profession a more equitable and attractive career. This starts by listening to real truckers – by that I mean we need to listen to professionals that make their living behind the wheel.

It’s no secret that most drivers don’t like the ELD mandate. ELDs have created more stress, more costs, and more fatigue. There is simply no safety justification whatsoever for an ELD mandate. We do believe that the final Hours-of-Service rule will provide some level of flexibility and relief. We supported the agency’s approach and we’re glad that thousands of drivers were able to provide input.

While we wanted to see additional changes – such as 6/4 and 5/5 split sleeper options – we eagerly anticipate these changes going into effect at the end of September. We also want to commend President Trump, Secretary Chao, Deputy Administrator Mullen, and Joe DeLorenzo for getting us to this point.

Recently, our nation has learned about the sacrifices truckers make on a daily basis. Throughout the COVID-19 pandemic, truckers were busy keeping grocery store shelves stocked and delivering critical medical supplies to healthcare professionals.

They did this under extremely difficult working and economic conditions – freight rates collapsed, restaurants closed, and personal protective equipment wasn't readily available. And many drivers were hundreds or thousands of miles from home. All of this highlighted something we've been saying for decades – the supply chain does not value drivers.

Too many drivers are forced to haul cheap freight. Too many motor carriers mistreat and underpay drivers. And too many shippers and receivers detain drivers for excessive periods of time. This has to be addressed. In the short term, FMCSA should move forward with OOIDA's petition to improve broker transparency. And the trucking industry must properly compensate drivers.

We discourage FMCSA from further delaying the entry-level driver training rule which is now pushed back until 2022. The initial delay granted earlier this year means that more new drivers will enter the industry without the basic skills needed to safely operate a truck. Driving a truck is a highly-skilled profession. More proficient instruction would reduce crashes and prepare individuals for a safe and viable career in trucking. This should absolutely include a national training standard that requires, at minimum, several hundred hours of behind the wheel training. There is no other way to learn.

The truck parking shortage is a national crisis. This is a safety issue for all highway users. We've been working with Congress to enact H.R. 6104, the Truck Parking Safety Improvement Act. This legislation would dedicate hundreds of millions of dollars for truck parking capacity projects. We're committed to working with anyone that wants to make things better. We're also committed to aggressively fighting against anyone that tries to make things worse.

I started trucking in 1994. All of these issues have gotten worse since then. I've seen it. I've lived it. We have solutions, but solutions require action – action from regulators, from lawmakers, and others in the supply chain. These issues won't magically disappear and I sure as hell don't want to have this same conversation in another 25 years!

Sincerely,

A handwritten signature in cursive script that reads "Lewie Pugh".

Lewie Pugh
Executive Vice President
Owner-Operator Independent Drivers Association, Inc.