



Owner-Operator Independent Drivers Association

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The Honorable Wiley Deck
Deputy Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # FMCSA-2018-0348, “Hours of Service of Drivers; Definition of Agricultural Commodity”

Dear Deputy Administrator Deck:

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 150,000 members located in all fifty states that collectively own and operate more than 240,000 individual heavy-duty trucks. OOIDA’s mission is to promote and protect the interests of its members on any issues that might impact their economic well-being, working conditions, and the safe operation of commercial motor vehicles (CMVs) on our nation’s highways.

OOIDA supports the revised definitions of “agricultural commodity” and “livestock” as well as the additional definition for “non-processed food.” These clarifications will assist CMV drivers who transport such commodities, growers or distributors of these commodities, and enforcement personnel. Under current regulations, drivers transporting agricultural commodities, including livestock, from the source of the commodities to a location within 150 air miles of the source, during harvest and planting seasons as defined by each State, are exempt from hours-of-service requirements. We believe the updated definitions better explain which commodities are covered under CFR §395.2 without jeopardizing highway safety.

As FMCSA continues reviewing these definitions, we encourage the agency to consider adding feed ingredients to the list of qualifying agricultural commodities. Feed ingredients are an integral part of the agricultural and livestock supply chains. Processors and distributors rely on these ingredients for their products. However, given the unpredictable nature of the feed ingredient formula/production process, drivers can often experience lengthy delays at these facilities. In order to maximize efficiency and clarity for drivers, feed ingredients should also be covered in the CFR §395.2 definitions.

Thank you,

Todd Spencer
President & CEO
Owner-Operator Independent Drivers Association, Inc.