



Owner-Operator Independent Drivers Association

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Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # FMCSA-2018-0224, "Record of Violations"

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 over 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 eliminating the requirement that drivers prepare and submit a list of their convictions for traffic violations to their employers annually. We agree that this is a duplicative provision since motor carriers are also required to make an annual traffic violations inquiry for each driver they employ. The annualized costs savings might help carriers and drivers invest more in their operations and equipment, thus improving highway safety.

We broadly favor the agency's efforts to remove costly, redundant, and burdensome regulations. These types of regulations, which are often more compliance obligations than safety measures, can disproportionately harm small-business truckers who have to cut through the red tape themselves. We encourage FMCSA to review and repeal similar duplicative requirements that have no meaningful impact on highway safety.

Thank you,

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