



## Owner-Operator Independent Drivers Association

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### Suggested Talking Points for Commenting on U.S. Department of Transportation Notice of Regulatory Review

On October 2nd, the U.S. Department of Transportation announced it is reviewing its existing regulations and other agency actions to evaluate their continued necessity and if they are crafted effectively to solve current problems. As part of these reviews, the Department invites public input on existing rules and other agency actions that are good candidates for **repeal, replacement, suspension, or modification**.

This is an opportunity to provide feedback on current DOT and FMCSA regulations that are harmful to owner-operators and small business truckers. OOIDA encourages its members to submit comments via [www.regulations.gov](http://www.regulations.gov) at Docket # [DOT-OST-2017-0069](#). The public comment period is currently open until Wednesday, November 1<sup>st</sup>. When submitting comments, here are some items to consider:

- The Department is seeking comment **on any and all** of its regulations and other agency actions, although rules that impose significant costs may provide greater opportunity for identifying and alleviating unnecessary burdens, including the ELD mandate.

#### DOT Significant Rulemakings Listed in the Notice:

- The FMCSA's final rule on Electronic Logging Devices and Hours of Service Supporting Documents (RIN: 2126-AB20, annualized costs of \$1.8 billion);
- The NHTSA's final rule on Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2 (RIN: 2127-AL52, annualized costs of \$4 billion);
- The FMCSA's final rule on Commercial Driver's License Drug and Alcohol Clearinghouse (RIN: 2126-AB18, annualized costs of \$154 million)
- The FMCSA's final rule on Minimum Training Requirements for Entry-Level Commercial Motor Vehicle Operators (RIN: 2126-AB66, annualized costs of \$368 million).

- The public is encouraged to identify regulations that (a) eliminate jobs or inhibit job creation; (b) are outdated, unnecessary, or ineffective; (c) impose costs that exceed benefits; (d) create a serious inconsistency or otherwise interfere with regulatory reform initiatives and policies.
- Make specific reference to the policy statement, guidance document, regulation, or other agency action you feel imposes a burden. This should be a citation to the Code of Federal Regulations, a guidance document number, or an Internet link.
- Provide a description about how a DOT policy or regulation has directly impacted your bottom line. Comments that reflect personal experience are more effective. Include specific examples of economic losses that were caused by federal regulations.