

# OPPOSE

## *Exemptions to the Hours of Service*

The Federal Motor Carrier Safety Administration (FMCSA) is considering four unstudied changes to the Hours of Service (HOS) rules. The common theme behind each request is to extend driving and/or working limits for commercial motor vehicle drivers.

**The FMCSA must show that each of these proposals will improve truck safety.**

### **Extending Short-Haul Operations:**

- An Insurance Institute for Highway Safety (IIHS) study found that operating on a short-haul exemption increased crash-risk by 383%.
- Research conducted for FMCSA confirms that crash risk increases along with the driving time for at least the 7th through the 11th consecutive hours of driving.

### **Extending the Adverse Driving Conditions Exemption:**

- Currently, there is no evidence to suggest that adding two hours to driving time when driving conditions are worse will reduce truck crashes, or that doing so will reduce truck occupant deaths, which are their highest levels since 1989.

### **Removing the 30-Minute Break After 8-Hours On-Duty:**

- The safety reforms in the HOS rule were based on years of scientific research and a recent field study.
- The 2011 final rule lists 80 sources of scientific research and data considered by the Agency and the Regulatory Impact Analysis cited nearly 50 scientific sources. All of this was on top of hundreds of studies regarding fatigue and hours of work that were considered in past HOS rulemakings.

### **Increasing Danger of Split Sleeper Berth Exemption:**

- Allowing for the driver to use splits of three and seven hours, four and six hours, or two five-hour periods will make it difficult to ensure that these rest periods are in fact being used to sleep and that the sleep is restorative.