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April 4, 2014

The Honorable Anne S. Ferro
Administrator, Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Suite W60-300
Washington, D.C. 20590

Dear Administrator Ferro:

On behalf of the Agricultural Retailers Association (ARA) and our members, I am writing to request a two year delay of the Federal Motor Carrier Safety Administration (FMCSA) pending requirement for all medical certificates issued for commercial drivers to be solely issued by certified medical examiners listed on the National Registry. ARA is concerned commercial drivers will have limited choices available under this program following the May 21, 2014 mandatory deadline as it appears there are very few certified medical examiners located in rural areas.

ARA members provide essential crop inputs such as fertilizer, seed, and crop protection products to their farm and ranch customers. These agricultural production operations are located in rural areas with very limited choices for medical examiners. The FMCSA announced as a goal the certification and registration of 40,000 medical examiners. However, after conducting searches on the FMCSA website it does not appear the agency is even close to its stated goal, especially in agricultural production areas throughout the nation. ARA is also concerned that requiring commercial drivers to potentially go through another medical examiner rather than their family physician, which may or may not be within the driver's health insurance network, could impose additional out-of-network medical costs. In addition, given the narrow choices of certified medical examiners under this mandatory program, many drivers may be required to drive significantly longer distances for medical exams causing a loss of work time and additional expenses.

Until all of the issues with this FMCSA program can be favorably resolved, ARA believes this mandatory program should be delayed for an additional two years. As our nation's health care insurance system remains in a state of flux, it makes sense to delay this FMCSA program which is inextricably tied to our nation's health insurance programs. Thank you for your review and consideration of this important request!

Sincerely,

Richard D. Gupton
Senior Vice President for Public Policy & Counsel