



May 23, 2012

Dear Chairman Boxer and Chairman Mica:

As representatives of organizations whose members directly or indirectly depend upon commercial motor vehicles, we write in opposition to a provision in the Senate's surface transportation legislation (MAP-21) that would mandate electronic on-board recorders (EOBRs) on every single one of the millions of commercial motor vehicles in use across the country.

Many of the members we represent are small businesses operating on extremely thin margins. They have been impacted by significant new regulatory burdens that have driven up their costs of doing business while still fighting to gain a footing in our slow to recover economy. Instead of adding new unproven and unnecessary regulatory burdens to industry, Congress and the Administration should be taking steps to ensure that burdens are limited to those that are absolutely essential.

All of us are committed to making our highways safer, but the Department of Transportation has not made a clear case that the safety benefits of an EOBR mandate outweigh the costs, especially for a blanket mandate as envisioned in MAP-21. Because of this, any use of EOBRs for HOS compliance should be voluntary and not forced through a federal government mandate costing industry at least \$2 billion.

As such, we urge the Conference Committee to remove EOBR language from the final surface transportation bill.

Sincerely,

Owner-Operator Independent Drivers Association
National Federation of Independent Business
National Ready Mixed Concrete Association
National Association of Small Trucking Companies
Portland Cement Association
American Concrete Pavement Association
National Precast Concrete Association
Agricultural Retailers Association
Petroleum Marketers Association of America