

October 6, 2017

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Mr. Bivan Patnaik, Chief, Regulatory Development Division  
Department of Transportation  
Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue SE  
Washington, DC 20590-0001

RE: Docket No. FMCSA–2016–0341 RIN 2126–AB96: Rulemaking Procedures Update

Dear Mr. Patnaik:

Thank you for the opportunity to comment on FMCSA’s Notice of Proposed Rulemaking captioned above.

By way of background, NRECA is the national service organization for America’s Electric Cooperatives. The nation’s member-owned, not-for-profit electric co-ops constitute a unique sector of the electric utility industry – and face a unique set of challenges. NRECA represents the interests of the nation’s more than 900 rural electric utilities responsible for keeping the lights on for more than 42 million people across 47 states. Electric cooperatives are driven by their purpose to power communities and empower their members to improve their quality of life. Affordable electricity is the lifeblood of the American economy, and for 75 years electric co-ops have been proud to keep the lights on. Because of their critical role in providing affordable, reliable, and universally accessible electric service, electric cooperatives are vital to the economic health of the communities they serve. As operating utilities, NRECA members employ drivers who must possess a valid commercial driver’s license (CDL) in order to operate the commercial motor vehicles (CMVs) owned by the cooperative.

In general we view the proposed changes to be beneficial to the Agency, regulated entities and the public. In particular the proposed update to the Direct Final Rulemaking procedures and the process for addressing adverse comments would be more efficient while still offering opportunity to ensure all stakeholders are given sufficient opportunity to express views.

Thank you for the opportunity to comment.

Mr. Bivan Patnaik  
October 6, 2017

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Martha A. Duggan", written in black ink.

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