



National Rural Electric Cooperative Association

A Touchstone Energy® Cooperative 

January 25, 2016

Honorable T.F. Scott Darling, III, Acting Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590
Via www.regulations.gov

RE: Comments of the National Rural Electric Cooperative Association on the Notice of Proposed Rulemaking, Docket ID FMCSA-2015-0396, RIN 2126-AB87

Dear Administrator Darling:

The National Rural Electric Cooperative Association (“NRECA”) is grateful for the opportunity to submit our comments on the above captioned Docket.

NRECA is the national service organization dedicated to representing cooperative electric utilities and the consumers they serve. Our membership consists of more than 900 not-for-profit rural electric utilities that provide electric energy to over 42 million people in 47 states or 12 percent of electric customers. Electric cooperatives were formed to provide reliable electric service to their owner-members at the lowest reasonable cost. Our members own and operate commercial motor vehicles that serve to operate and maintain our electric systems. We estimate that NRECA members own and/or operate approximately 11,000 vehicles, a portion of which are Commercial Motor Vehicles.

NRECA and its members support the Federal Motor Carrier Safety Administration’s proposed rulemaking’s requirement that passengers in Commercial Motor Vehicles (“CMV’s”) use seat belts.

First, many of our members operate in states where passengers in CMV’s are required by state law to wear seatbelts. For NRECA members in those states, the Rulemaking would simply synchronize federal requirements with state law.

Second, even in states where passenger seat belt use in CMV's is not required, many NRECA members have enacted policies within their cooperatives requiring passengers in cooperative CMV's to wear seat belts.

NRECA members operate in a culture of safety. Adopting additional seatbelt requirements for CMV passengers is consistent with that culture.

We thank you for the opportunity to submit these comments.

Respectfully,

(original signed – to be delivered to FMCSA)

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