



NATIONAL FRATERNAL ORDER OF POLICE®

328 MASSACHUSETTS AVE., N.E.
WASHINGTON, DC 20002
PHONE 202-547-8189 • FAX 202-547-8190

CHUCK CANTERBURY
NATIONAL PRESIDENT

JAMES O. PASCO, JR.
EXECUTIVE DIRECTOR

The Honorable Daphne Y. Jefferson
Acting Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

6 September 2017

Dear Acting Administrator Jefferson,

I am writing on behalf of the members of the Fraternal Order of Police to advise you of our strong support for the Electronic Logging Device (ELD) rule and of our opposition to any delay to the implementation deadline of 18 December 2017.

The FOP views this as an important public safety issue with respect to our officers as well as the public we serve. Traffic incidents, until 2016, was the leading cause of police officer fatalities. Currently, although not the leading cause of fatalities, traffic related fatalities have increased by 10%. We believe this rule will facilitate a decline in those statistics. According to the Federal Motor Carriers Safety Administration (FMCSA), 1,844 crashes will be avoided every year, saving 26 lives, as a result of the adoption of ELDs. If ELDs are in place, it makes it much more difficult for truck drivers to violate Hours of Service rules without being detected. Studies have shown that drivers of trucks equipped with ELDs have higher rates of compliance with Hours of Service and lower crash rates, which improves safety on our nation's highways.

In 2012, Congress, through the Moving Ahead for Progress in the 21st Century Act (MAP-21), directed FMCSA to require all drivers currently required to record their driving time on paper logs to do so electronically. The ELD mandate did not change the Hours of Service rules, it only made them easier to enforce and harder to evade. This leads to increased compliance and improved safety.

The FOP believes that the ELD rule will make enforcement of important safety rules easier and will therefore improve compliance and safety. Its implementation should not be delayed.

On behalf of the more than 330,000 members of the Fraternal Order of Police, I thank you for attention to this important public safety matter. If I can be of any additional assistance on this issue, please do not hesitate to contact me or my Senior Advisor, Jim Pasco, in my Washington office.

Sincerely,


Chuck Canterbury
National President

— BUILDING ON A PROUD TRADITION —