

NATIONAL
Aquaculture
ASSOCIATION

March 1, 2019

The Honorable Elaine Chao, Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

The Honorable Raymond Martinez, Administrator
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue, S.E., Suite 600
Washington, D.C. 20590

RE: Hours of Service Drivers: Agricultural Livestock; Application for Exemption
Federal Docket Management System Number: FMCSA-2018-0334

Dear Secretary Chao and Administrator Martinez:

Thank you for the opportunity for the National Aquaculture Association¹ to comment in support of the Notice of Application for Exemption submitted by the National Cattlemen's Beef Association, Livestock Marketing Association, American Farm Bureau Federation, American Beekeeping Federation, American Honey Producers Association and our Association for an exemption from certain provisions in the hours-of-service (HOS) rules.

We greatly appreciate and support the use of the aquatic species definition cited in the Notice taken from the National Aquaculture Policy Act of 1980. U.S. aquaculture is a very diverse agricultural activity and this definition includes and benefits every aquafarm or specialized long-haul business that may transport live farm-raised aquatic animals across the United States.

On behalf of drivers who transport live aquatic animals, we are in favor of the request for approval to, after 10 consecutive hours off duty: drive through the 16th consecutive hour after coming on duty; and drive a total of 15 hours during that 16-hour period.

Transporting live aquatic animals (baitfish, food fish, or crawfish for processing or live delivery to wholesale or retail buyers, fry or fingerlings to stock farms for grow-out to marketable size, recreational fish for pond stocking, and ornamental fish for the aquarium or water gardening hobby) requires driver focus on road safety, equipment maintenance, animal health, and water quality. Moving live aquatic animals by truck also requires specialized equipment, species and delivery specific loading, as well as on-time delivery. For reference, fish are loaded in pounds of live fish per gallon of transported water. With the current repair and reconstruction of the

¹ The National Aquaculture Association (NAA) is a U.S. producer-based, non-profit association founded in 1991 that supports the establishment of governmental programs that further the common interest of our membership, both as individual producers and as members of the aquaculture community. For over 27 years NAA has been the united voice of the domestic aquaculture sector committed to the continued growth of our industry, working with state and federal governments to create a business climate conducive to our success, and fostering cost-effective environmental stewardship and sustainability.

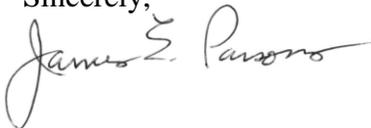
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nation's interstate system, and delivery routes that traverse rural and secondary highways, all fish haulers are experiencing delays in transit that is creating detrimental health risks for aquatic animals. Additionally, western and northern fish farms that produce recreational fish have a short stocking season. Thus, the four additional hours of drive time will better accommodate trip delays, aeration equipment maintenance, water quality checks, unexpected delivery delays, and customer associated challenges. Transporting live aquatic animals is not an occupation for the inexperienced, untrained or faint-of-heart. These producer and drivers are committed to providing customers with dependable, high quality healthy products that are delivered safely and efficiently.

As the exemption request states, by completing extra training and conducting trip planning activities, aquatic animal haulers can use the extra drive time in an equivalently safe manner. This request is specifically focused on providing flexibility to a limited number of expert drivers and specialized trucks and not a large proportion of the long-haul trucking community. And this request for exemption also includes significant safety data demonstrating the well-known fact that the livestock hauling industry is one that has a strong and continuous safety record.

Thank you again for the opportunity to comment in support of the request for exemption from the current hours of service for livestock haulers. The National Cattlemen's Beef Association, Livestock Marketing Association, American Farm Bureau Federation, American Beekeeping Federation, American Honey Producers Association, and our Association wholeheartedly request the support of the Department of Transportation in granting this request so that the aquatic animal production and delivery system may continue to thrive, deliver live and healthy animals where they need to go, and continue to be responsible members of the commercial long-haul community that is focused on preventative and continuous highway safety.

Sincerely,

A handwritten signature in cursive script that reads "James E. Parsons".

Jim Parsons
President