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September 18, 2014

Docket Management Facility (M-30)
U. S. Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

RE: Docket Number FMCSA-2007-27748

FAS: 202-493-2251

Dear Department of Transportation Representative:

The National Ground Water Association (NGWA) supports realistic and practical initiatives to best address having competent and safe drivers behind the wheel of those vehicles deemed commercial motor vehicles whether for an entry level employee or one who is upgrading a commercial drivers license. We believe the agency must recognize how private vocational carriers (non-traditional trucking) and their business structure and employees differs from those of traditional trucking firms.

Since driving is ancillary to the primary business of vocational carriers like water well drilling and pump installation firms, we strongly believe candidates who must drive as part of their job function should be properly trained and in possession of a CDL with any other licenses and certifications prior to applying for employment at a given firm. While an employer may elect to fund and/or conduct the training of an entry level driver, we believe this is an employer's prerogative and should not be a mandate.

Industry Profile

There are approximately 9,000 water well drilling firms in the United States. Most are multi-generation family-owned businesses located in rural areas. The average water well drilling firm employs less than 10 people, the bulk of which are engaged in actual field service operations (drilling and pump work).

These firms provide well construction, well maintenance, and irrigation services to agricultural and rural areas. Drilling firms may also provide complete water systems



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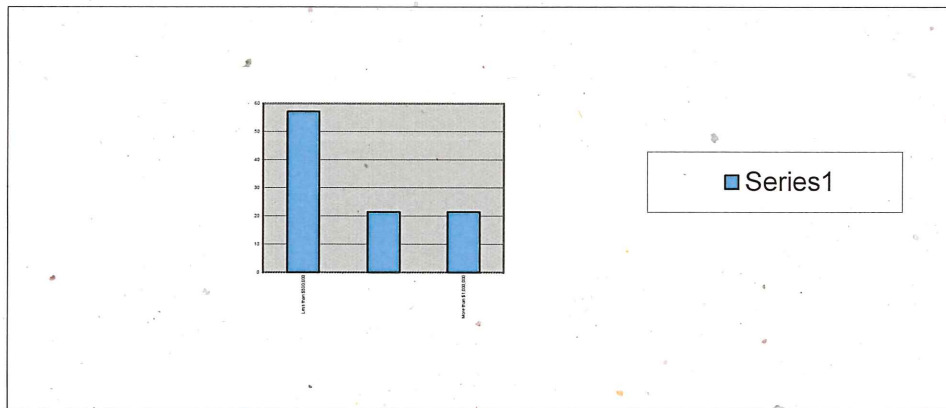
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Hydrogeologic Address / At 40.05.37°N, 82.54.30°W on 10' of Alexandria silt loam soil underlain by clayey till averaging less than 30' in thickness, atop 250 to 300' of Ohio black shale (Devonian age). Well yields are 2 gpm or less, except in sand and gravel lenses, which can yield 5 gpm or more.

and water treatment services. Their customers include, but are not limited to, homeowners, farmers, ranchers, recreational areas, parks, golf courses, schools, hospitals, community water systems, and commercial processing plants.

Most of the companies in the ground water industry are small businesses and have annual sales of less than half a million dollars.

ANNUAL GROSS RECEIPTS BY FIRM (by percentage)



Water well drilling contractors meet the water supply needs of America 365 days a year. Given that the majority of the states in the United States continue to suffer some level of drought conditions, this water supply service becomes even more crucial. Natural disasters, such as, floods and hurricanes also create a critical and immediate demand for our industry services.

The majority of portable drilling rigs travel less than 5,000 miles per year from job site to job site. The table below provides a breakdown of the miles these rigs travel annually.

| | |
|-----------------------|-------|
| Less than 2,000 miles | 27.2% |
| 2,000 to 5,000 miles | 37.5% |
| 5,001 to 7,500 miles | 15.4% |
| Over 7,500 miles | 19.9% |

Using the scenario that a portable drilling rig travels 5,000 miles annually, the drilling crew driver spends 95% of work time in drilling and field operations and 5% on the road. For that 5% of time on the road, the water well drilling firm drivers must comply with the same standards as a traditional truck driver whose primary job is driving.

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Comments:

As you analyze the data gathered and comments submitted, please consider your rulemaking should not assume one size fits all; thus we strongly recommend that you include water well drilling firms, as well as other private vocational carriers within the stakeholder group. These groups represent smaller firms where driving is ancillary to the primary job. Water well drilling firms are keenly concerned with driver competence and safety as they generally lack the luxury of a vast pool of alternate employees or specialized vehicles. Drilling rigs and support vehicles that are the life blood of these firms along with their employees, thus there is an inherent commitment to safety and good driving practice.

Should the FMCSA decide to proceed with a Reg Neg process, the National Ground Water Association intends to respond to its official notice by nominating individuals for consideration to serve on the committee.

Sincerely,



Christine Reimer
Director of Government Affairs