



NORTH AMERICAN EQUIPMENT DEALERS ASSOCIATION

Serving Farm, Industrial and Outdoor Power Dealers

1195 Smizer Mill Road • Fenton, Missouri 63026-3480 • Phone: (636) 349-6221 • Fax: (636) 349-5443 • www.naeda.com

August 10, 2010

The Honorable Anne Ferro
Administrator
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE, Suite 600
Washington, DC 20590

Re: Docket No. FMCSA-2010-0230
Hours of Service; Limited Exemption for the Distribution of Anhydrous Ammonia in Agricultural Operations

Dear Administrator Ferro:

On behalf of equipment dealers who are affiliated with the North American Equipment Dealers Association (NAEDA), we are writing to support the proposal by the Federal Motor Carrier Safety Administration (FMCSA) to grant a two-year limited exemption from the Federal hours-of-service (HOS) regulations to allow the transportation of anhydrous ammonia from any distribution point or local retailer to their ultimate customer.

NAEDA represents and works with nearly 5,000 retail agricultural, industrial and outdoor power equipment dealerships in the U.S. and Canada. Collectively, these dealerships employ approximately 100,000 people. NAEDA is an association that works with 18 affiliated associations throughout North America and it is on their behalf – and the dealerships we all serve – that we submit support for this exemption.

We believe Congress, when it authored the HOS agricultural exemptions in 1995, intended to address the special needs of the nation's agricultural industry and rural communities. The HOS agricultural exemption is critical for the timely delivery and transportation of agricultural inputs during peak planting and harvesting seasons defined by each state.

Farmers and ranchers expect their equipment dealers to provide parts, repairs and service of planting and harvesting equipment and, as such, should also be included in a HOS agricultural exemption. In today's fast pace of agriculture, parts, repairs and service provided by equipment dealers are critical elements in the success and efficiency of production agriculture and we believe and respectfully request that FMCSA consider a HOS exemption for those inputs in future rulemaking considerations.

It is vitally important that the agricultural exemption to hours-of-service be allowed for all segments of transportation of farm supplies and inputs.

Thank you for considering our comments and we look forward to continuing our shared mission of maintaining public safety without disruption to the just-in-time transportation and delivery of agricultural inputs.

Sincerely,

Michael Williams
Vice President of Government Relations