

ITD's Truck Permitting Negotiated Rulemaking Comments

Below is a listing of the comments submitted for the Department's 2018 negotiated rulemaking. To review the comments, please go to the listed page numbers.

Thank you!

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5/25/18	Simplot Transportation	2
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May 25, 2018

Ramón S. Hobdey-Sánchez
Governmental Affairs Program Specialist
Idaho Transportation Department
3311 West State Street
P.O. Box 7129
Boise, Idaho 83707-1129

RE: Proposed Rules on CMV Permits

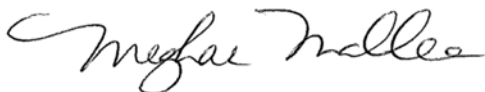
Dear Mr. Hobdey-Sánchez:

Thank you for the opportunity for Simplot Transportation to comment on the state's efforts to consolidate and streamline the commercial motor vehicle permit process as directed by SCR130.

We support the proposed rules as they are currently drafted. Reducing the number of administrative rule chapters and the single and annual permit categories will be beneficial for both motor carriers and the ITD. We also appreciate the effort to update and clarify the rule definitions and permit language, including the change from "overlegal" permits to "special" permits. These rule modifications will simplify the permitting process, reduce administrative burdens and promote the safe and effective movement of goods throughout the state.

Again, thank you for the opportunity to comment on the Idaho Transportation Department's proposed rules. If you have any questions, please contact me at 208-780-8868 or meghan.mallea@simplot.com.

Sincerely,



Meghan Mallea
Regional Trucking Manager
Simplot Transportation



June 7, 2018

Idaho Transportation Department
Attn: Ramón S. Hobdey-Sánchez
Governmental Affairs Program Specialist
3311 W. State St.
P.O. Box 7129
Boise ID 83707-1129

Re: Truck Permit Rule Making

Dear Mr. Hobdey- Sánchez

Thank you for the opportunity to comment and participate in the rule making process.

By way of background, our company is the primary carrier for sugar beets in Idaho and Oregon. We have terminals in Paul, American Falls, Nampa and Twin Falls. In addition, we have a manufacturing facility in Burley where specialized trailers for sugar beets are produced.

The efforts put forth by you and the ITD team to streamline the permitting process were professional, steady and focused. I especially appreciate the thoroughness of the evaluation of existing rules and how they might be streamlined.

I strongly support the proposed rule changes.

In section 39.03.03.450.085 where "Hazardous Conditions" are addressed, the proposed rule calls for either option 1 or option 2. Either option will work but Option 2 is preferable because it is the simpler of the two.

Thank you again for your hard work.

Dan Rice

A handwritten signature in black ink, appearing to be "DL" or "Dan Rice", written over a horizontal line.

Chairman
Transsystems



June 12, 2018

ITD Rule Comments
Attn: Ramon Hobdey-Sanchez
PO Box 7129
Boise, ID 83707-1129

Dear Mr. Hobdey-Sanchez,

On behalf of the Northwest Pilot Car Association Board of Directors and members we are writing this letter to follow up with suggested proposals given to you on May 23rd by Vice President Nancy Nagy, who attended the online video conference at District 1 in Coeur d' Alene.

The Northwest Pilot Car Association has suggested a change to Rule 39.03.05, 400. PILOT/ESCORT VEHICLES. #01. This rule is currently being added into the Proposed Consolidation Rules as the rules never stated at which height a pilot/escort was needed. The current rule addition states that loads over 16' feet high require a front pilot/escort with a height pole deployed. Currently the Idaho annual permit allows oversize loads to travel up to 15'6" high and any load above that height up to 16'0" requires travel under a single trip permit.

Northwest Pilot Car Association proposal is to change this rule to require a front pilot/escort with a height pole deployed for any load that exceeds 15'6" high for the following reasons:

1. Updated National Electric Safety Code (NESC) requirements as of 2017 allow overhead distribution and conducting wires to be placed at a minimum of 15'5" high on roads, streets and other areas subject to truck traffic. (attached is a copy of the current NESC code rules)
2. Due to increasing population throughout the state, new lines are being installed to accommodate this growth and are being installed to meet the minimum requirement. Damaged lines are being replaced at the updated lower minimum height requirement of 15'5".
3. Transporting companies hauling over-height loads up to 16'0" tall are not provided any advanced warning that they may strike and possibly tear down a line that is under 16'1" which poses a danger to any persons traveling within the vicinity of such an incident whether they are in a motor vehicle, on a bicycle or walking.
4. Line heights are affected by weather and can be lowered by the weight of frost or snow and extreme heat will also cause lines to sag.
5. The pilot/escort standard pole height to be set at is 6" above the load height, which means that for any load in excess of 15'6" chances are that the height pole will be tapping overhead lines since most of the lines off primary highways have been measured under 16'0".

Northwest Pilot Car Association has also suggested that the state add a rule with the following requirement: PILOT/ESCORT CERTIFICATION WITH A MINIMUM AGE REQUIREMENT OF 18 YEARS, adding

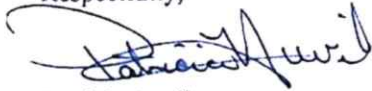
an exemption to farm to farm movement and implements of husbandry equipment, for the following reasons:

1. Flagging procedures are commonly needed on a daily basis. Example, for longer loads that will be encroaching oncoming turn lanes, for loads that need to encroach the oncoming traffic lane due to vehicles or other obstacles on the shoulder of two lane highways, and when the tractor or trailer hauling the oversize load has a mechanical problem. Idaho reciprocates ATSSA Flag Training with Montana, Oregon, Washington and Utah which all have a minimum requirement of 18 years of age.
2. Idaho rules require the pilot/escort vehicle operator carry a stop/slow paddle and reflective vest in order to perform flagging procedures, however, does not require the training necessary to perform the duties should the need arise and legally a person must be 18 years of age to perform these duties outside of their pilot/escort vehicle.
3. Due to multiple state-wide ongoing construction projects loads that would normally be able to travel without a pilot/escort on interstate routes are unable to do so. Therefore, more oversize load traffic is traveling with pilot/escorts on two lane highways that have narrower lanes than the oversize load width, which is requiring pilot/escorts to perform more flagging duties.
4. A minimum 8 hr. Pilot/escort certification course trains the pilot/escort to function with the knowledge that we're there to provide safety to the traveling public first and foremost. An untrained pilot often feels that they need to protect the load which is resulting in reckless driving maneuvers, such as driving into oncoming traffic lanes and attempting to cut off vehicles that are near the oversize load. Untrained pilot/escorts are also holding their stop/slow paddles outside their window while traveling down the roadway. These are all unsafe practices and endanger the persons traveling nearby.
5. Untrained pilot/escorts are not aware that Idaho rules exist for pilot/escorts or where to find them, nor are they aware of the Best Practices Guidelines for pilot/escorts.
6. The untrained pilot/escort is not carrying proper equipment attached to their vehicles, such as signage and lights, nor the necessary extra equipment inside their vehicles.
7. Insurance companies will not insure a person under the age of 18 to operate as a pilot/escort for hire, therefore, damages to structures, traffic signals, overhead lines, residences, or businesses will not be covered by the pilot/escorts personal insurance and costs become the burden to the transporting company and the state.
8. A certified pilot/escort is provided with the training and knowledge that they must comply with their state's rules for vehicle insurance (commercial auto coverage) and have a business license to operate and/or properly register their business with the state.

Idaho can accept current pilot/escort training programs already in place or they can create their own training program that they feel suits the needs of the state.

We thank you for your time and consideration on these suggestions, as we feel now more than ever with the increasing population in the state of Idaho we have an obligation to the safety of any and all persons we should encounter. Should this need further discussion, possibly with legislation, we are willing and able to testify in person.

Respectfully,



Patricia Auvil
President



Nancy Nagy
Vice President

From
2017 National Electric Safety Code (NESC)
Part 2 Section 232

ft

Table 232-1—

**Vertical clearance of wires, conductors, and cables above ground,
roadway, rail, or water surfaces**

(Voltages are phase to ground for effectively grounded circuits and those other circuits where all ground faults are cleared by promptly de-energizing the faulted section, both initially and following subsequent breaker operations. See the definitions section for voltages of other systems.

See Rules 232A, 232B1, 232C1a, and 232D4.)

Nature of surface underneath wires, conductors, or cables	Insulated communication conductors and cable; messengers; overhead shield/surge-protection wires; effectively grounded guys; ungrounded portions of guys meeting Rules 215C2 and 279A1 exposed to 0 to 300 V ^{① ② ③} ; neutral conductors meeting Rule 230E1; supply cables meeting Rule 230C1 (ft)	Noninsulated communication conductors; supply cables of 0 to 750 V meeting Rule 230C2 or 230C3 (ft)	Supply cables over 750 V meeting Rule 230C2 or 230C3; open supply conductors, 0 to 750 V ^① ; ungrounded portions of guys meeting Rules 215C2 and 279A1 exposed to over 300 V to 750 V ^{①④⑤} (ft)	Open supply conductors, over 750 V to 22 kV; ungrounded portions of guys meeting Rules 215C2 and 279A1 exposed to 750 V to 22 kV ^{①④⑤} (ft)	Trolley and electrified railroad contact conductors and associated span or messenger wires ^①	
					0 to 750 V to ground (ft)	Over 750 V to 22 kV to ground (ft)
Where wires, conductors, or cables cross over or overhang						
1. Track rails of railroads (except electrified railroads using overhead trolley conductors) ^{② ③ ④}	23.5	24.0	24.5	26.5	22.0 ^④	22.0 ^④
2. Roads, streets, and other areas subject to truck traffic ^②	15.5	16.0	16.5	18.5	18.0 ^③	20.0 ^③
3. Driveways, parking lots, and alleys ^②	15.5 ^{② ③}	16.0 ^{② ③}	16.5 ^②	18.5	18.0 ^③	20.0 ^③
4. Other areas traversed by vehicles, such as cultivated, grazing, forest, and orchard lands, industrial sites, commercial sites, etc. ^③	15.5	16.0	16.5	18.5	—	—
5. Spaces and ways subject to pedestrians or restricted traffic only ^③	9.5	12.0 ^④	12.5 ^④	14.5	16.0	18.0
6. Water areas not suitable for sailboating or where sailboating is prohibited ^④	14.0	14.5	15.0	17.0	—	—

June 13, 2018

IDAHO TRANSPORTATION DEPARTMENT DOCKET NO. 39-0300-1801

We submit these comments on behalf of our clients – the Amalgamated Sugar Company and US Ecology Corporation. Both clients, through their transportation providers, operate a substantial number of trucks on Idaho highways transporting sugar beets and hazardous waste materials.

On behalf of both clients, we have been actively working on several significant truck transportation matters for the past several years with Idaho Transportation Department (ITD) staff, members of the Idaho Legislature, other organizations that are engaged in the trucking business, and other interested parties. For the past 18 months, our focus has been on reviewing existing state permitting requirements to determine whether it was possible to reduce the number of permits required to operate trucks in Idaho.

We are a part of the trucking industry working group that approached ITD and the Idaho Legislature to begin the process of reviewing the existing statutory and administrative rule requirements for truck permit streamlining. We worked closely with ITD staff and appreciate the professionalism and collaborative approach that ITD exhibited during the development and passage of Senate Concurrent Resolution 130 (SCR 130).

SCR 130 “encourages the Idaho Transportation Department to initiate negotiated rulemaking in order to consolidate and streamline truck permits.” We appreciate the fact that the Department commenced this rulemaking in the spirit of the Resolution.

The draft rules obviously reduce the total number of required permits to around 10 – a substantial reduction from current statutory and rule requirements. We applaud the Department’s staff for their work in finding ways to achieve this reduction.

We do not believe that there are ways to further reduce the number of required permits. The substantial reduction in permits fully achieves the goals of the Idaho Legislature and industry in consolidating and streamlining trucking permits.

As you know, the implementation of the draft rules will require a variety of amendments to existing statutory law to implement the rule changes. As we have done throughout this process, we will continue to collaborate with ITD staff in the drafting and implementation of the amendments.

Once again, we appreciate the Department’s staff’s professionalism and willingness to work with us throughout this process. ITD is a valued partner in modernizing the overall transportation system in our state, and we look forward to working with you in the future.

Best Regards,



Roy Eiguren J.D.

10589 S. HIGHWAY 95
P. O. BOX 671
COEUR d'ALENE ID 83816-0671



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FAX (208) 667-2144
E-MAIL: alc@idahologgers.com

ITD CMV Permit Rulemaking Comments
Attn: Ramon Hobdey-Sanchez
P.O. Box 7129
Boise, Idaho 83707-1129

June 14, 2018

Re: Comments on Rulemaking for 2018 Truck Permitting Consolidation

Dear Mr. Hobdey-Sanchez,

Thank you and the Idaho Dept. of Transportation for this opportunity to participate in the “Negotiated Rulemaking” process for Commercial Motor Vehicle Permits Consolidation. The Associated Logging Contractors, Inc. (ALC) is a 501 (c) 6 non-profit trade association within Idaho. Established in 1966 by logging and log trucking contractors our membership organization currently has over 450 businesses as members. These family owned businesses are located throughout Idaho and for the most part operate within the state. 197 businesses in the ALC are trucking companies. These members own and operate anywhere from 1 truck per company to 200 trucks with a range in between. Our logging contractor businesses also own and operate trucks as part of their diversified logging operations. In short, rules and laws for commercial trucking impact all of ALC’s 450 + members’ businesses.

In general, the ALC is supportive of the overall consolidation goal expressed in this “Truck Permitting Consolidation” rulemaking. Philosophically, simpler is better.

However, upon review at this point in the process we have the following concerns:

39.03.04 – Replaces Annual Oversize/Overweight Permits with Single Trip Permit

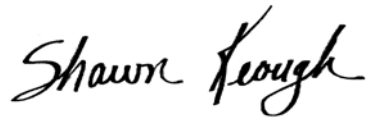
Some of our members operate heavy haul businesses and an Annual Permit is their preference. A Single Trip permit may be difficult to obtain in a short time frame that sometimes occurs when the need to move large pieces of logging equipment with little notice arises. Also, please keep in mind that many parts of rural Idaho have only dial-up internet, if any access at all, and places where cell phones do not work. In the logging business, weather and forest fires necessitate unforeseeable need within a 24-hour period for movement of oversize and overweight equipment. Not only will our heavy haul businesses be severely impacted by this change but our logging companies that depend upon their services will be too.

While we understand the Department’s reasoning for this proposal to eliminate the annual permit opportunity and going to single trip permits, if this decision stands it will cause severe economic and operational disruption to our businesses causing a loss of economic opportunity and mobility.

We ask that you delete this proposal and work with us to develop a different alternative that addresses the Department’s concerns while allowing our businesses to continue to operate efficiently and recognizing the technological challenges of rural Idaho.

There may be other concerns with the proposals and we reserve comment on those until the formal rule making process. Thank you again for this opportunity to provide input for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Shawn Keough". The signature is written in a cursive, flowing style.

Shawn Keough
Executive Director
Associated Logging Contractors - Idaho



June 14, 2018

Idaho Transportation Department

Attn: Ramon S Hobdey-Sanchez

Government Affairs Program Specialist

3311 West State Street

P.O. Box 7129

Boise, Idaho 83707-1129

Re: Truck Permit Rule Making

Dear Mr. Hobdey-Sanchez

Thank you for the opportunity to comment and participate in the rule making process.

We are a native Idaho carrier servicing all lanes throughout the state. We are very diversified in our equipment licensing from 80,000 to 129,000 pounds. We permit extra length/excess weight and 129K vehicle combo loads as well as hauling oversize/overweight loads which currently require annual permits. Reducing the amount of permits would certainly reduce the burden of our licensing department.

We support the proposed rules to reduce the number of permits required for commercial vehicles in the state of Idaho.

Thank you,

Michelle Miller

Vice President

June 15, 2018

Idaho Transportation Department
Attn: Ramón S. Hobdey-Sánchez
Governmental Affairs Program Specialist
3311 West State Street
P.O. Box 7129
Boise, Idaho 83707-1129

Re: Truck Permitting Consolidation

Dear Mr. Hobdey-Sánchez:

The Idaho Trucking Association appreciates the opportunity to provide comments on the Department's proposed rules to consolidate the commercial vehicle permitting process. Our Association supported the passage of Senate Concurrent Resolution 130 during the 2018 Legislative Session and believe that the proposed rules align with its charge.

Part of the mission of the Idaho Trucking Association is to serve and represent the interests of the trucking industry with one united voice, and to strive for a healthy business environment. In 2016, the trucking industry accounted for 1 out of every 15 jobs in Idaho, and 72% of our communities depend exclusively on trucks to move their goods. The economic wellbeing of Idaho is directly tied to the trucking industry and the ability to get commodities to market, making the reduction of any unnecessary regulatory measures a priority of our members.

We support the proposed rules to reduce the number of permits required for commercial vehicles in Idaho. Carriers and the Department will both benefit from reducing the number of permits and clarifying rule language. Having a reduced number of permits will encourage business in Idaho and reduce administrative burdens. This will allow our members to further prioritize safety and invest in Idaho's economy.

Again, thank you for allowing the Idaho Trucking Association to comment on the Department's proposed rules. Our members will continue to work collaboratively with the Department on these rules and future projects and appreciate the willingness to participate in these important matters to our industry and state.

Sincerely,



Michelle Miller
Chairman





July 6th, 2018

Idaho Transportation Department
Ramón S. Hobdey-Sánchez, J.D.
Governmental Affairs Program Specialist
(208) 334-8810 (office)
RE: ITD's CMV Permit Negotiated Rulemaking

To whom it may concern:

Inland Crane, Inc. (ICI) has been involved with the rule making process and attended the rule making meeting held on June 13, 2018. There are multiple issues that are being proposed in this rulemaking proposal. ICI along with the rest of the heavy haul industry, are strongly opposed to the abolishment of the current annual permit process.

The proposed option of trip permits versus the annual permits will increase the amount of work required and cause undue hardship on the transportation industry. Eliminating annual permits will severely impact ICI's ability to serve its customers from HVAC contractors to bridge contractors. ICI has cranes and trucks that do taxi work around the State 7-days a week, 24-hours a day. Having to submit a trip permit for each location for every oversized load would have a significant economic impact on ICI and its customers.

The new proposed system, ICI would go from ordering 5 trip permits on average per week, because our annuals cover the vast majority of our daily activities, to ordering 250 to 300 permits a week. Not to mention the direct and indirect costs associated with this proposal will cost the tax payers far more money than the current system.

If this proposal were to pass, ICI would like to know how ITD plans on staffing this massive increase in work load that would be required. With today's fast paced world it is important that the transportation of key equipment be available to help build Idaho.

In conclusion, ICI is opposed to the elimination of annual permits, as it will increase time and money for the State, transportation companies and tax payers. The annual permits are a good system that works well. ICI believes there is always room for improvements, including the annual permitting process, which can be stream lined to make the process easier and more cost effective for the State. ICI is willing to work with the State to help that process. Again, ICI is opposed to the complete dismissal of the annual permit.

If you would like to discuss this in person or more detail please feel free to contact me by e-mail at Jeremy@inlandcrane.com or phone 208-345-9508.

Sincerely,

Jeremy Haener
Vice President
Inland Crane, Inc.
Office: 208-345-9508
Cell: 208-869-6731
E-mail: jeremy@inlandcrane.com

CC: Craig Roberts

Craig.roberts@idaho.gov

www.inlandcrane.com

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July 9, 2018

The Honorable Jerry Whitehead
Chairman – Idaho Transportation Board
Idaho Transportation Department
P.O. Box 7129
Boise, ID 83707-1129

RE: CMV Permit Rulemaking

Dear Chairman Whitehead,

On behalf of the almost 600 Idaho companies that make up the Idaho Associated General Contractors (AGC) and the tens of thousands of Idahoans they employ, I write to provide comments on proposed rules being considered by the Idaho Transportation Board (Board) regarding permits for commercial motor vehicles (CMV), Docket No. 39-0300-1801.

The Idaho AGC wishes to thank the Board and the hard working staff of the Idaho Transportation Department (ITD) for the tremendous effort put forth to ensure that the CMV rules are updates, simplified, and made more consistent. Generally speaking, the proposed rules are well constructed and straight forward.

Despite this, the Idaho AGC has a specific concern it is hoping that the Board will address prior to publishing the next draft of the proposed rules. Specifically, we are troubled by the proposal to eliminate the annual permit for oversize/overweight CMVs. As currently drafted, the proposed rule would make commercial operators complete unnecessarily duplicative paperwork and subject them to unnecessarily expensive time delays for each CMV trip. Currently, commercial operators file for an annual permit and pay additional fees for each trip completed under the one set of paperwork.

While Idaho AGC members believe that every care must be taken to ensure that each trip is conducted safely and in accordance with ITD rules and that commercial operators are responsible to timely pay all related fees for each trip, requiring complete applications for each trip is excessive and without warrant.

This significant change will dramatically increase the regulator burden on Idaho companies. Several Idaho AGC member firms have reported that the costs in personnel time and lost productivity directly associated with this overly burdensome governmental roadblock will increase more than ten fold. For example, one Idaho AGC member which transports cranes across Idaho for use in projects being completed by private contractors for ITD has estimated that the change would require them to go from submitting an average of 5 applications to more than 250 per week. This is unacceptable.

--continued--

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Headquarters: 1649 W. Shoreline Dr. Boise, Idaho 83702 (208) 344-2531

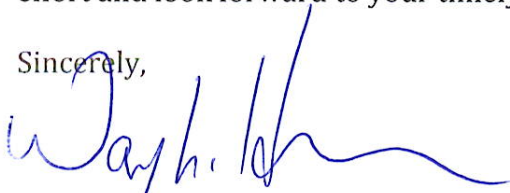
Visit our website: IdahoAGC.org

The Honorable Jerry Whitehead
July 9, 2018
Page Two

Even more concerning is that this unnecessary obstacle is being erected at the same time that Executive Order No. 2017-06, signed by Acting Governor Brad Little on May 19, 2017, directs all Department of state government to examine ways to reduce regulatory burdens – not increase them.

The Idaho AGC recommends removing this portion of the proposed rule before the next draft is published. We and our member firms are ready to assist the Board and ITD in this effort and look forward to your timely response.

Sincerely,



Wayne L. Hammon
CEO – Idaho AGC

CC: The Honorable C.L. "Butch" Otter, Governor – State of Idaho
The Honorable Brad Little, Lieutenant Governor – State of Idaho
The Honorable Brain Ness, Director – Idaho Transportation Department
The Honorable Robert Geddes, Director – Idaho Department of Administration
The Honorable Jani Revier, Administrator – Idaho Division of Financial Management
The Honorable Joe Palmer, Chairman – Idaho House Transportation & Defense
Committee
The Honorable Bert Brackett, Chairman – Idaho Senate Transportation Committee
Ramon Hobdey-Sanchez, ITD

From: Lance Giles [mailto:lgiles@apublicpolicy.com]

Sent: **Wednesday, July 18, 2018 9:08 PM**

To: Mollie McCarty; Reymundo Rodriguez; Ramon Hobdey-Sanchez; Lance Green

Cc: Roy Eiguren; Dan Rice; Jim Riley

Subject: Permit Streamlining - Annual Permits

Molly –

Great talking with you today. As discussed, I am sending you an e-mail confirming our support to continue with the annual permits for overweight and oversize vehicles. If you have any questions, please don't hesitate to contact me.

Unfortunately, I will not be able to join you at tomorrow's board meeting. I have a conflict.

Thank you.

Lance

Lance Giles, J.D.

Eiguren Ellis Public Policy

800 W Main | Boise, Idaho 83702

208-972-0972 mobile | 208-343-1300 office

www.apublicpolicy.com



RILEY STEGNER AND ASSOCIATES

July 24, 2018

Ramón S. Hobdey-Sánchez
Governmental Affairs Program Specialist
Idaho Transportation Department
3311 West State Street
P.O. Box 7129
Boise, Idaho 83707-1129

RE: Comments on Commercial Motor Vehicle Permits Consolidation rulemaking

Dear Mr. Hobdey-Sánchez:

We write regarding the modification of certain annual permits during the Idaho Transportation Department's (Department) negotiated rulemaking process for Commercial Motor Vehicle Permits Consolidation. Our clients, Idaho Forest Group, Stimson Lumber Company, Molpus Timberland Group, Hancock Timber Resource Group, and Bennett Forest Products Inc., collectively own and operate numerous sawmills in Idaho and over 400,000 acres of commercial forestland.

Safe and efficient logging operations, including the trucking of logs and the efficient transportation of oversized logging equipment, are key to the success of logging and thereby the entire forest sector of Idaho. The Associated Logging Contractors of Idaho are the logging industry's experts on logging and hauling policies, and we align with and support their position on this rule.

We commend the Department for working with Idaho's hauling and transportation stakeholders to streamline the permitting process for commercial vehicles. By consolidating permits, commercial vehicles moving commerce throughout Idaho will retain the high level of safety established by the Department while also increasing the efficiency by which operators comply with permitting requirements of the state.

The latest version of the rule (39.03.04) replaces the Annual Oversize/Overweight Permit with a Single Trip Permit. As other impacted stakeholders have indicated, such a modification would significantly impact the ability for haulers to apply for and receive permits in a timely fashion, hindering the movement of commerce throughout Idaho.

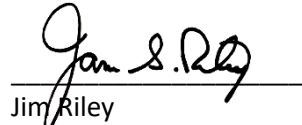
We understand the Department has concluded that a new automated permitting system will reduce the time for permit issuance. However, not only is the new system untested, it relies on internet access and electronic systems that are not uniformly available across Idaho. Such access in many areas of the state, particularly in rural communities where forestry and associated operations will require Oversize/Overweight Permits, is simply not available.

Therefore, we recommend the Department retain the existing Annual Oversize/Overweight Permit in parallel with a Single Trip Permit, giving haulers the option of which to use. Such an arrangement will provide the Department with time to fully implement the new automated system and allow impacted

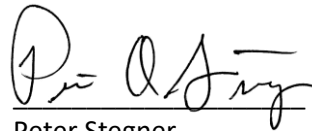
stakeholders and customers to fully understand the impact of future changes to the Annual Oversize/Overweight Permit.

We appreciate the opportunity to comment and be involved in the rulemaking process. We also understand the Department may be considering initiating a stakeholder meeting on this issue, which we think is appropriate. We would certainly participate if such a meeting is scheduled.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim S. Riley", written over a horizontal line.

Jim Riley
Principal
Riley Stegner and Associates

A handwritten signature in black ink, appearing to read "Peter A. Stegner", written over a horizontal line.

Peter Stegner
Principal
Riley Stegner and Associates



July 25, 2018

Idaho Transportation Department
Attn: Ramón S. Hobdey-Sánchez
Governmental Affairs Program Specialist
3311 W. State St.
P.O. Box 7129
Boise ID 83707-1129

Re: Truck Permit Rule Making

Dear Mr. Hobdey- Sánchez

Thank you for the opportunity to comment and participate in the rule making process.

I strongly support your efforts in the permit streamlining process. These efforts should help both ITD and the trucking industry.

The only area I disagree with is the elimination of the annual permits under 39.03.04.

I understand the motivation behind this and think we should follow-up on the topic but the new online permitting systems is still relatively new. I am concerned there will be the inevitable "bugs" in the system that will need to be fixed. A period of time for the system to stabilize might be the safer course.

Also, many potential users of the online system may not have ready access to the internet. We all understand Idaho is remote. When you get to northern Idaho or away from the Interstate System there are many places without cell service let alone wired internet.

Thank you again for you work on this. Please let me know if I can be of any assistance.

Dan Rice

A handwritten signature in black ink, appearing to be "Dan Rice".

Chairman
Transystems