

Ramon Hobdey-Sanchez

To: Wayne Hammon
Cc: Brian Ness
Subject: RE: ITD Rulemaking

From: Wayne Hammon [<mailto:whammon@idahoagc.org>]
Sent: Thursday, July 18, 2019 11:41 AM
To: Ramon Hobdey-Sanchez
Cc: Wayne Hammon; Brian Ness
Subject: ITD Rulemaking

Mr. Hobdey-Sanchez,

On behalf of the Idaho Associated General Contractors (AGC) and our members statewide I write to thank you for the very professional and educational session held yesterday concerning proposed CMV rules 39.02.22, 39.03.01, 39.03.05, and 39.03.06. I found the meeting very well organized and administered.

The Idaho AGC has reviewed all four of the proposed rules (each is marked as “draft #1” on the ITD rulemaking page) and want to thank ITD for drafting the rules in a manner consistent with the comments we submitted during the 2018 rulemaking process (and repeated below for the record). While the new rules do shift much of the renewal, record submittal, and payment burden to the vehicle operator/owner and away from the Department, this change is accomplished through what I believe to be a reasonable change.

There are two small improvements to this provision I hope ITD will consider. First, receiving the quarterly reporting form in the mail currently serves as a reminder to permit holders that the report is due. The proposed rules eliminate this reminder. The Idaho AGC suggests that ITD send a shot, automated electronic reminder of the deadline each quarter to permit holders who wish to receive it. This could be done without any cost to the Department through an email group that includes a link to the reporting website. Second, given that permit holders will not receive a reminder each quarter, the Idaho AGC suggests that ITD allow a grace period of one full quarter for submitting the report. That way if a permit holder misses a quarter they could “catch up” when they file their next report.

As we stated last year, the Idaho AGC strongly opposes requiring all applications for permits and all reporting to be done solely online. Likewise we strongly oppose the elimination of “annual” permits, especially for NonReducible Loads. To ITD’s credit, the current drafts of the proposed rules align with these positions.

Once again, thank you for work on this matter.

Wayne

Wayne L. Hammon, CEO
Idaho Associated General Contractors
www.WeBuildIdaho.org www.IdahoAGC.org

From: shawn@idahologgers.com [mailto:shawn@idahologgers.com]
Sent: Thursday, July 18, 2019 5:16 PM
To: Ramon Hobdey-Sanchez
Cc: Lance Green; Mollie McCarty; Karen Woodhead; 'Jerry Deckard'
Subject: Formal Comment on proposed changes to 39.02.22 RE: ITD CMV Rulemaking
Importance: High

Dear ITD,

Please accept these written comments in regard to proposed changes to 39.02.22. Thank you very much for allowing the Associated Logging Contractors and our 470+ business that are our members – many of whom are trucking companies or who own and operate trucks as part of their logging business – to participate in the rulemaking and specifically in the hearing on proposed changes to 39.02.22 . We appreciate it!

As I mentioned in comments during the hearing the proposed changes to 39.02.22 **are** problematic for some of our members who have difficulty accessing the internet in our rural state. While this change **may assist ITD it is not “customer” friendly** to those businesses that do not have access to the internet (and there really are places in Idaho that this is still true!). Further, staff comments at the hearing July 17, 2019, that ITD customers could simply go to a nearby POE or ITD District Office to print out their forms or utilize computers or internet located there needs to be verified to us and if indeed this can occur needs to be guaranteed it will be. Experience informs us that ITD District Offices don’t offer this type of public service. Experience informs us that POE offices may not have the staff , the facilities, or the operating hours to offer this type of public service.

We are further concerned about the proposed elimination of the mailing from ITD to carriers for installment payment billing and notice. This proposal suggests that the installment payment vouchers will be provided with the initial invoice and if these are lost, well, no reminder will be coming from ITD and the penalty provisions remain in place if payment is late or forgotten.

We remain concerned by these proposed changes and based upon what we heard at the July 17, 2019 meeting **are opposed to it at this time**. It remains concerning to us that ITD continues to discount the realities of some of its rural based customers – the ones who pay ITD fees to receive ITD services many of which are mandated on the customers by ITD.

Thank you again for allowing us to participate in this process! We look forward to continuing to be involved!
Sincerely,

Shawn Keough

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*Ms. Shawn Keough*  
*Executive Director*  
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7/19/2019

Mr. Ramon Hobdey-Sanchez

Comments regarding proposed rule changes 39.02.22

These proposed changes appear to be the same general changes that were discussed in meetings in 2018 when several users shared with your leadership the various difficulties with the proposed changes.

The issue of internet usage in Idaho is not universally the same as it is in a major metropolitan area. Some places have no access and others only have dial up capacities which will time out before an action is completed.

Your Director has said that your agency supports commerce....this rule does not support commerce statewide.

There are instances where movement of loads can change from the moment of loading and then no method exists to provide for the notification to the ITD since cell phone service also is not universally available in our State.

Sometimes we find ourselves in a position of the users of your system cannot accommodate the movement to technology that is NOT universally available statewide. It is with these issues in mind that we ask you to reconsider these actions and at least operate with two systems until such time as technology is available in ALL of Idaho.

On behalf of the logging contractors of the State of Idaho these comments are submitted.

Thank you,

Jerry Deckard

## Ramon Hobdey-Sanchez

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**To:** Roy Eiguren  
**Cc:** Lance Green; Mollie McCarty; Karen Woodhead; Bobbi-Jo Meuleman  
**Subject:** RE: ITD CMV Rulemaking

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**From:** Roy Eiguren [<mailto:reiguren@apublicpolicy.com>]  
**Sent:** Thursday, July 25, 2019 8:15 PM  
**To:** Ramon Hobdey-Sanchez  
**Cc:** Lance Green; Mollie McCarty; Karen Woodhead; Bobbi-Jo Meuleman  
**Subject:** RE: ITD CMV Rulemaking

Ramon,

My comments are on behalf of our client the Amalgamated Sugar Company and its transportation vendor, Trans Systems.

We applaud and appreciate the continuing excellent work by you and your team to further reduce the regulatory burden on shippers throughout the state. Additionally we strongly believe that you are meeting both the policy and the spirit of the Governor's Red Tape Act. Congratulations.

We have no proposed additions to or deletions from the rules as drafted. We fully support the deletion of current rule 39.03.06.050.100 as well as the deletions and additions to 39.03.06.050.200. Overall these changes provide clarity and simplicity to shippers engaged in the operation of commercial vehicles up to 129,000 pounds.

Our clients and I personally want to recognize and convey our appreciation for the partnering you have done with the shipping industry to provide for less costly and more efficient regulatory rules.

With Best Regards,

Roy Eiguren

Cc: Bobbi Jo Meuleman