



The Honorable Elaine Chao
Secretary, U.S. Department of
Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

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

February 26, 2019

Re: Docket FMCSA-2018-0334

Secretary Chao and Administrator Martinez,

The American Sheep Industry Association (ASI) appreciates the opportunity to comment in response to the Notice of Application for Exemption submitted by the National Cattlemen's Beef Association, Livestock Marketing Association, American Farm Bureau Association, American Beekeeping Federation, American Honey Producers Association and the National Aquaculture Association for an exemption from certain provisions in the Hours of Service (HOS) rules. Since 1865, ASI has been the national trade organization representing the interests of nearly 90,000 sheep ranchers located throughout the country who produce America's lamb and wool. ASI is a federation of forty-five state sheep associations representing a diverse industry.

The Sheep Industry supports the petition and requests the approval to, after 10 consecutive hours off duty to drive through the 16th consecutive hour after coming on duty; and drive a total of 15 hours during that 16-hour period for drivers transporting livestock, insects and aquatic animals. Further, we support requirements as part of this effort that drivers: complete fatigue management training, have a sufficient safety record and follow certain documentary requirements.

The sheep industry relies on access to safe, efficient, and qualified livestock haulers. While we share the same needs and considerations of other livestock and aquaculture industries, we also have unique needs for livestock transportation. Nearly half of the nation's ewes graze on federal lands during some part of the year, meaning that at least twice a year a significant portion of our nation's sheep are being moved dozens or even hundreds of miles to grazing on the nation's forests or grasslands.

Many sheep producers have also found success in targeted grazing; grazing solar arrays, large sporting facilities, or golf courses again requiring the safe and efficient movement of livestock. And as with other livestock industries, consolidation in the packing and feeding sectors have increased the distances producers need to move live animals to reach necessary services.

More than just the fact that sheep are not always raised where the consumer market for lamb is greatest, the nation's largest packing facilities are located in Michigan, Denver and central California. Getting live animals from the ranch, feedlot or sale barn to the packing facilities or to productive grazing relies on the statutory and regulatory exemptions in place to ensure animal welfare. Animal welfare and highway safety are top priorities for the sheep industry and given the safety record of agricultural transporters included in the referenced petition, the exemption requested is compatible with both.

For these reasons, the American Sheep Industry Association supports the request for an exemption from the current HOS rules for livestock transporters and urges the adoption by the Department Transportation, Federal Motor Carrier Safety Administration.

Thank you for the opportunity to comment and if we can provide anything further, please contact Chase Adams, chase@sheepusa.org or (303) 771-3500.

Sincerely,

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

Benny Cox, President
American Sheep Industry Association