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Docket Management Facility
U.S. Department of Transportation
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE, West Building
Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Docket No. **FMCSA-2013-0470** Hours of Service of Drivers: American Trucking Associations (ATA); application for exemption

To Whom It May Concern:

The purpose of this letter is to respond to the notice of application for exemption from the American Trucking Association (ATA), an a request for comments issued by FMCSA on May 23, 2014.

The International Association of Drilling Contractors (IADC) is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes those drilling contractors operating approximately ninety three percent of the drilling rigs in the United States. U. S. land drilling contractors depend heavily on commercial motor vehicles (CMV's) to safely move, service and supply their rigs.

A primary concern for IADC members who are involved in rig moving operations is that they will not be covered by the exemption. Current regulation states that only "specially trained drivers of CMV's that are *specially constructed* to service oil and natural gas extraction sites may employ this provision."

The term "specially constructed" places a limit on the equipment and personnel that are eligible for the "waiting time" exemption as it applies to Hours of Service. Drivers of tandems and pole trucks, two trucks commonly used in the oilfield to move rigs, are not allowed an exemption for waiting time because this equipment does fall within the category of being "specially constructed" to service a well. However, it's important to note, that these CMV's are an *essential component* of well servicing. Rig movers are required to set a drilling rig substructure over a conductor pipe in order for a well to be drilled. Without their operational capabilities, the wells simply do not get drilled. Additionally, without the exemption, oilfield operations throughout the U.S. could potentially have a drastic set back.



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Furthermore, if the exemption was allowed for the drivers of CMVs and the related equipment involved in rig moving, IADC members believe that the overall health and safety of the drivers would be increased. The percentage of drivers in violation would likely decrease. DOT records indicate that many of the accidents today are from fatigued drivers who are in violation of their Hours of Service and equipment would not be left on locations or roadways, increasing the possibility of a collision.

The oil and gas drilling industry operates twenty four hours a day, seven days a week. Consequently, support services associated with them, such as CMV's involved in rig moving, are required to operate on the same basis. The FMCSA must be responsive to the needs of the industry that operates under unique circumstances and the safety concerns related to those unique circumstances. IADC strongly suggests that all operators of CMV's involved in rig moving fall under the exemption.

IADC appreciates the opportunity to comment on this: Docket No. **FMCSA-2013-0470** Hours of Service of Drivers: American Trucking Associations (ATA); application for exemption.

Sincerely,

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Representing the worldwide oil and gas drilling industry since 1940