



American Lamb Council



American Sheep Industry Association, Inc.  
www.sheepusa.org



American Wool Council

September 11, 2013

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

RE: DOCKET # FMCSA-2013-0283

**Comments of the American Sheep Industry Association regarding the Application for Exemption from the 30-Minute Rest Break Provision of the Hours-of-Service Regulations for Commercial Motor Vehicles**

The American Sheep Industry Association (ASI) is the national trade organization for the more than 80,000 sheep producing farm and ranch families in the United States. Since 1865, ASI has been representing the diverse interests of its producers, state affiliates and allied organizations. ASI appreciates the opportunity to provide comments to the Federal Motor Carrier Safety Administration (FMCSA) in support of granting a 2-year exemption from the 30-minute rest break provision of the Hours-of-Service regulations for Commercial Motor Vehicles (CMV).

ASI is aligned with the larger unified group of livestock representatives speaking on behalf of sheep, cattle, hog and chicken organizations, along with veterinarians, asking for a 2-year exemption from the 30-minute rest-break provision. Requiring compliance with the 30-minute rest-break rule places the health and welfare of the livestock at risk and provides no apparent benefit to public safety, while forcing the livestock industry and their drivers to choose between the humane handling of animals or compliance with the rule. The process of transporting livestock, whether to slaughter, for transfer of ownership, for purposes of breeding or simply finding forage for feed, is a significant concern to the agricultural industry. The animals face a variety of stresses including temperature, humidity and weather conditions. For these reasons, current industry guidelines recommend that drivers avoid stopping as internal trailer temperatures can increase rapidly because of the loss of airflow through the trailer.

Another thing FMCSA to consider is the diverse production of lambs in the United States. Lambs are raised in all fifty states, but more than half of all lambs are processed in one of the three major slaughter plants located in California and Colorado. The Western states are the largest lamb producing states but since most of these states do not have large-scale lamb processing facilities, lambs must be shipped more than 150 miles to be slaughtered.

The sheep industry is very diverse and relies on the safe, timely transportation of its animals from all corners of the country. ASI strongly encourages FMCSA to provide a two-year exemption from the 30-minute rest-break provision for all CMVs transporting livestock. The safety and welfare of our animals remains a top priority and we encourage you to carefully consider these comments and listen to the concerns of the men and women who take pride in providing food for our growing nation and the world.

Sincerely,

Clinton H. Krebs, President  
American Sheep Industry Association