

July 27, 2017

The Honorable Brian Babin
Representative
U.S. House of Representatives
316 Cannon House Office Building
Washington, DC 20515

Dear Representative Babin:

On behalf of the undersigned organizations, we write to you in support of H.R. 3282, the *ELD Extension Act of 2017*.

While we represent remarkably diverse segments of the economy, our respective members and businesses are all negatively impacted by the electronic logging device (ELD) mandate. In the absence of an outright repeal of the mandate, the rule must be delayed until the Federal Motor Carrier Safety Administration (FMCSA) addresses numerous unresolved issues identified by impacted stakeholders.

We remain adamant that the ELD mandate should be repealed. However, there are significant technological and real-world concerns that have not been addressed by FMCSA. These concerns include the certification of devices (or lack thereof), connectivity problems in remote areas of the country, cybersecurity vulnerabilities, and the ability of law enforcement to access data. The FMCSA's inability or refusal to resolve these issues makes the enactment of H.R. 3282 unquestionably necessary.

The ELD mandate is estimated to cost impacted stakeholders more than \$2 billion, making it one of the most expensive federal transportation rulemakings over the last decade. This is a massive unfunded mandate that provides no safety, economic, or productivity benefits. Notwithstanding the significant costs associated with the rule, it simply will not be ready for implementation on December 18, 2017.

H.R. 3282 will provide FMCSA and impacted stakeholders more time to work out fundamental problems associated with the rule. We appreciate your leadership on this issue and we urge all of your colleagues to support this bill.

Sincerely,

Agricultural Retailers Association
American Pyrotechnics Association
Associated Equipment Distributors
Lucas Oil Products
Mid-West Truckers Association
National Association of Small Trucking
Companies
National Cotton Council
National Grain and Feed Association

National Ground Water Association
National Hay Association
National Motorists Association
National Ready Mixed Concrete Association
Owner-Operator Independent Drivers
Association
Petroleum Marketers Association of
America