

From: [Cynda Quinn Bennett](#)
To: [UTC DL Records Center](#)
Subject: Fw: Scanned document from HP ePrint user
Date: Wednesday, March 7, 2018 2:05:33 PM
Attachments: [filename-1.pdf](#)

Here is my response. Please confirm that you have received it. Thanks!

Cynda Quinn Bennett
President
QM Transport (USA) Inc.
QM Transport Ltd
PO Box 348
Custer, WA 98240
360-920-2330

Received
Records Management
03/07/18 14:22
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

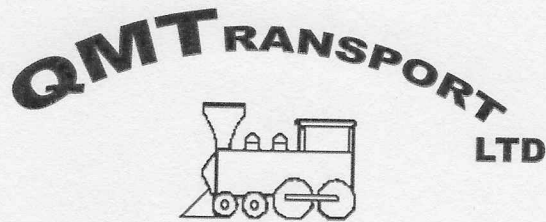
----- Forwarded Message -----

From: "eprintcenter@hp.com" <eprintcenter@hp.com>
To: cynda@qmtusa.com
Sent: Wednesday, March 7, 2018 2:00 PM
Subject: Scanned document from HP ePrint user

This email and attachment are sent on behalf of **cynda@qmtusa.com**.

If you do not want to receive this email in future, you may contact **cynda@qmtusa.com** directly or you may consult your email application for spam or junk email filtering options.

Regards,
HP Team



I have read the proposed rules under TR 170780. I am in agreement with some of the plan, as these have been the railroad requirements for the 12 years that I have provided crew transportation for the BNSF. That said, I do have some concerns about the following:

I strongly disagree that the age requirement should be 18. This would create a dangerous situation for all involved. The insurance industry is fully aware of these dangers and charge for coverage accordingly. My insurance requires drivers to be 25 years of age, or my company will incur an extra insurance fee.

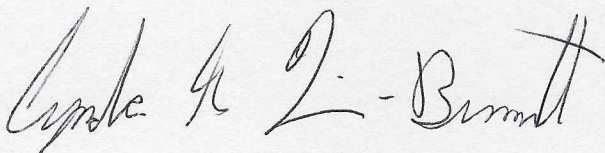
BNSF requires winter traction tires be mounted on crew transportation vehicles from November through March. This is a requirement that will be implemented under the new rules. I may misunderstand the proposal, but it appears the requirement will be for studded tires. QM uses Blizzaks or equivalent winter traction tires. It is our experience that winter traction tires provide better traction and occupant safety for the majority of road conditions we face during the winter months in Western Washington. A joint study completed by The State of Washington and the University of Washington in 2001 supports QM's choice for traction tires without studs.

The UTU would like driver training to be handled by an outside source. Doing so would put an unreasonable financial strain on QM Transport and other transportation providers. The turnover rate in this industry is extremely high. After 12 years in the industry, QM has experienced a 50% attrition rate for new drivers in the first 90 days. The significant cost of third party training, combined with an attrition rate of 50% would result in an insurmountable financial burden. Currently, QM pays our drivers for the time they are in training, pays for the background checks and TWIC cards required by Homeland Security, the drug screening required by Motor Carriers, pays for required safety training to enter refineries, bi annual driver abstracts, and the list goes on. With the already staggering financial commitment required to hire and train new drivers, QM cannot financially support the additional cost to our training and operations budget by employing a 3rd party to meet these requirements. If the UTU would like to add to the training

materials we use, we would gladly welcome their input and could implement those changes to our existing, proven training program.

Additionally, I have some concerns about requiring medical cards for drivers. In the 12 years in operation, I have not heard of a single accident that was the result of a medical issue the driver experienced. I have no issue with vision, hearing and physical mobility testing, but the current DOT medical testing is much more in depth than that. These positions provide entry level salaries and benefits. If a person is required to have extensive medical testing, they will not be interested in continuing the hiring process. A long time employee with an impeccable safety record recently applied for a medical card. He was told they would require an echo gram, a cardiology exam, and a pulmonary exam based on his past health records. He did experience a heart attack years ago, but is under doctor's care and has no ongoing or related issues today. If this bill becomes law, he will be unable to continue employment with QM Transport. Neither he, nor I can afford to pay for these tests. I'm concerned many candidates will be unable to meet the stringent medical requirements if they've overcome past medical issues that still trigger additional testing. Keep in mind, the majority of these jobs are filled by retirees, people between jobs or the disabled. Also, insurance does not cover DOT medical exams, so whether or not they will cover the additional testing required to qualify for a medical card is not certain. If they do, the 6000.00 deductible would be a deterrent for taking the additional testing.

Thank you for taking to time to listen to my opinion and concerns.

A handwritten signature in cursive script that reads "Cynda G. Quinn-Bennett". The signature is written in black ink and is positioned above the typed name and address.

Cynda G Quinn-Bennett
President
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360-920-2330