



American Beekeeping
Federation

3525 Piedmont Road, Building 5, Suite 300, Atlanta, Georgia 30305

March 4, 2019

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

Re: Docket No. FMCSA-2018-0334: Hours of Service of Drivers

Dear Secretary Chao and Administrator Martinez,

The American Beekeeping Federation welcomes the opportunity to submit these comments in response to the notice of application for exemption submitted by the National Cattlemen's Beef Association, Livestock Marketing Association, American Farm Bureau Federation, American Beekeeping Federation, American Honey Producers Association and the National Aquaculture Association for an exemption from specific conditions in the current "hours of service" rules.

The American Beekeeping Federation (ABF) has been the largest national beekeeping organization since 1943. The ABF represents all aspects of the beekeeping industry. Our membership includes migratory beekeepers that transport bees throughout the country to pollinate one-third of our nation's food.

We are in favor of the request for approval to, after 10 consecutive hours off duty: drive through the 16th consecutive hour after coming on duty; and drive a total of 15 hours during that 16-hour period, on behalf of drivers transporting livestock, insects and aquatic animals.

The exemption request not only asks that those hauling livestock, insects and aquatic animals be allowed to drive 15 hours during a 16-hour work day and rest the required 10 hours, but also requires these drivers to complete fatigue management training, have a sufficient safety record and be willing to follow certain documentary requirements.

Some of the transportation of bees from "bee yard" to pollination site may be completed in the 11 hours that are allotted under current regulations, however, many of these routes cannot. Due to the demand for pollinating honey bees, beekeepers are transporting bees across the country. This even includes bees traveling from Florida to California.

Secretary Chao and Administrator Martinez

Page 2

March 4, 2019

During these long hauls, bee haulers must remain travelling during daylight hours. The heat from the sun and generated from the bees during daylight-hour stoppage is very detrimental to the health of the colonies. Therefore, the additional four hours of drive time would greatly help facilitate the successful transportation of these important insects.

Hauling bees requires some flexibility due to the many circumstances that haulers may encounter. These challenges may be caused by weather, traffic or other obstacles along the way. In order to ensure the health and safety of bees as well as other livestock, we are requesting this exemption.

The ABF agrees that public safety on our highways is the number one priority. The added safety requirements and fatigue management provided in this program will help ensure the safety of livestock haulers as well as the general public.

Thank you for the opportunity to comment in support of the request for exemption from the current hours of service for livestock, insect and aquatic animal haulers. The American Beekeeping Federation, American Honey Producers Association, American Farm Bureau Federation, Livestock Marketing Association, National Cattlemen's Beef Association and the National Aquaculture Association request the support of the FMCSA in granting this request so that the livestock, insect and aquatic animal hauling industry may safely deliver these animals and continue to keep our roads safe.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim May". The signature is fluid and cursive, with a large initial "T" and "M".

Tim May
President
American Beekeeping Federation