Dear ARB team/board-members,

I am writing these comments to shed light on my specific situation (as a small fleet) and for other small carriers in the same position. I hope you will read and hear the following with an open mind to do what’s right for those genuinely trying in this ever-more challenging industry, but need assistance and time.

My comment(s) are intended for the “Economic Hardship Extension” section for small fleets that are unable to receive the necessary funding to comply.

As a small fleet, I applied for funding from the two financial institutions (US Bank & Chase) with whom I had a prior relationship with hoping I would be approved for lending. However, I was rejected by both parties. As a result, I attempted to seek assistance by way of the “Economic Hardship Extension”, but there too I was rejected. I believe the “Economic Hardship Extension” is intended to relieve smaller, financially incapable fleets from compliance for the short term; however, does not dismiss the expectations from these same carriers to become compliant, but yet allows for a more methodical, planned out, financially lenient manner the carrier can take advantage of rather than be set up for failure.

So with that in mind, if you ask why I was rejected by the ARB team, simply due to the fact that I didn’t have my 2 trucks register as of January 1st 2012. But forgive me, for I didn’t have anything registered at that point in time because I started business later on in the year (2012). With that said, as a small fleet owner trying to steady his operation, I am asking the board to please add an amendment that will allow me (and other carriers like me) to continue operating (rather than cease) but with the mutual understanding that a plan should be put in place to comply by January 1st, 2017. (Fundamentally, small fleets that have been in business for a longer period of time than I, one can argue should be more mature and financial capable to absorb these costs of bringing their fleet into compliance; however they have been given the extension opportunity and I’d like to be given the same chance.)

(Note I have already invested in bringing both trailers and their TRUs into compliance, but need further time to be at a financial position to absorb the remaining costs of bringing both trucks into compliance. And as you know, the regulatory and compliance initiatives and their corresponding costs do not just end there…)

Please help small fleets stand a chance to do what’s right within their means.

Thank you for your time and understanding,

A.V.E.