



January 18, 2018

Ms. Cathy Gautreaux
Deputy Administrator
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Dear Deputy Administrator Gautreaux:

Re: FMCSA-2017-0360

Western Growers is an agricultural trade association representing growers, packers, and shippers of fresh vegetables, fruit, and tree nuts in the states of California, Arizona, Colorado, and New Mexico. Our members grow and ship nearly 45 percent of the fresh produce commodities produced in the United States.

While Western Growers supports a permanent exemption to the ELD mandate for carriers transporting our commodities beyond the 150 air mile radius, at this time we would also request that an extension for comments be granted to afford additional time for industry stakeholders to submit comments.

Our shippers primarily rely on small independent carriers to transport our commodities to markets throughout the United States, and at this time there remains considerable confusion over the implementation of ELD within both the carrier and shipper industry. Unlike many stable commodities, due to the perishability of fresh vegetables and fruit our industry requires efficient, flexible, and timely transportation, which is mostly provided by the smaller independent owner operators.

We appreciate your consideration to our request.

Very truly yours,

Matthew M. McInerney
Senior Executive Vice President