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June 3, 1999

Commission Secretary
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Suite TW-A325
Washington, DC 20554

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Network Services Division
Portales II
445 12th Street, S.W.
Room 6A-320
Washington, DC 20554

Re: FCC Docket No. 92-105
File No.: NSD-99-24
Notice, Request for Comments

To Whom It May Concern:

The following comments are submitted on behalf of Landstar System, Inc. and all Landstar companies in response to the Notice and Request for Comments recently issued by the Federal Communications Commission ("FCC") with respect to the United States Department of Transportation's ("DOT") Petition for Assignment of an Abbreviated Dialing Code (N11) to access Intelligent Transportation System ("ITS") services nationwide. By way of background, the Landstar companies, including Landstar Gemini, Landstar Inway, Inc., Landstar Ligon, Inc., Landstar Ranger, Inc., and Landstar Express America, Inc., together operate over 8,700 vehicles, most of which are primarily 18-wheel tractor trailer units, and every year travel more than 750,000,000 across America's highways. Landstar's operators drive a substantial amount of miles in every state in the country as well as Canada.

In its Petition, the DOT requests permission from the FCC to establish a single, three digit dialing code that can be accessed

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nationwide to obtain up-to-date and accurate travel information, such as the status of roadway construction, accident locations and alternative routes. Although such information is currently available through some state and local government agencies, the use of a N11 Code will make such information much more accessible to the motoring public, including Landstar's operators. Landstar is very much in favor of the DOT Petition because of the many benefits it will offer the motoring public. The following are Landstar's comments on why the FCC should allow the DOT to establish a single, three digit dialing code for the purposes intended in the Petition:

1. The Use of an N11 Code for Travel Information Will Make the Nation's Highways Safer and Less Congested. First and foremost, Landstar strongly believes that the DOT's position, if granted by the FCC, would result in making the nation's highways safer and less congested for Landstar's operators and the motoring public. In the past several years, Landstar has noticed a substantial increase in traffic on the nation's interstate and highway systems throughout the country. This increased traffic coupled with the need to repair and place the aging highway infrastructure has created substantial highway delays due to congestion and road construction. Our experience has been that motor vehicle accidents are more likely to occur in construction zones and heavy traffic.

Landstar believes that the availability of a N11 code for traffic information will substantially affect safety on the highway in a number of ways. First, many drivers on the road, including Landstar's operators, now utilize cellular telephones on a daily basis. When dialing a number while operating a motor vehicle, an operator's attention can be diverted from the highway and may result in accidents. Allowing the use of a short three digit number to obtain needed traffic information will substantially minimize the possibility that a driver's attention could be diverted while attempting to dial a cellular phone while operating a motor vehicle. Although we encourage Landstar's operators to not use their cellular while in actual operation of their vehicle, we know from experience that other drivers regularly use their cellular phones while in operation. The use of a N11 code by the DOT to obtain traffic and construction information will

certainly alleviate the possibility of a driver being involved in an accident while attempting to dial a much longer 7 or 10 digit phone number.

Another safety advantage of allowing an N11 code to obtain traffic information is the ability of Landstar's operators and other users of the highway systems to obtain up-to-date and accurate information regarding construction zones and accident sites. This information, which now is not available to Landstar's operators without substantial research to determine the appropriate state or local agency to contact, will assist all drivers to avoid congested work zones or accident sites. Being able to obtain this information on a timely basis will allow those drivers accessing the system to alter their routes of travel to avoid problem areas. Such avoidance will save lives because of reduced accidents and significantly help traffic flow by warning drivers to avoid problem areas.

2. In N11 Code to Provide Traffic Information Will be a Great Convenience for the Motoring Public. As indicated previously, Landstar's operators cannot easily obtain traffic, weather and road construction information in many of the outlying areas in which Landstar operates. Although this information may be available from state and local agencies, it is unduly cumbersome and inconvenient for Landstar's operators to locate, in each area of the country they operate, the means to obtain this information. Having a national N11 code that will provide local and regional traffic information will eliminate this problem not only for Landstar's operators but for everyone operating on the country's highways. Both travelers and long-haul commercial drivers will be able to obtain immediate information regarding road construction and heavily congested areas in a city which they may be unfamiliar. Again, the availability of such information will undoubtedly result in a decrease in traffic congestion and, more importantly, a decrease in the number of accidents caused by the increased congestion.

3. Use of an N11 Code for Traffic Information May Reduce the Number of Non-Emergency 911 Calls. Studies have shown that non-emergency 911 calls are frequently made to determine whether roads have been closed due to

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accidents or weather. Obviously, the 911 nationwide system was not intended to pass along this type of information on a non-emergency basis. Landstar believes that the availability of a N11 code to obtain traffic information will provide motorists attempting to obtain information regarding the status of a road closure or similar event a alternative means of information so as to decrease the number of non-emergency 911 calls.

In sum, the FCC should grant the DOT Petition because of the substantial benefits to the public and to professional truck operators such as those working for Landstar. Landstar certainly appreciates the FCC considering its comments and ruling favorably upon the DOT position.

Very truly yours,



Dennis P. Owen
DPO/kap

Cc: Jim Martin - Landstar System, Inc.
Mark Johnson - ITS America