



January 26, 2018

Honorable Elaine Chao
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington DC 20590

Madam Secretary,

The American Horse Council (AHC) would like to bring your attention to the growing concerns and confusion occurring across the country regarding commercial driver and vehicle regulations. There is considerable frustration within the agricultural community, and specifically within the equine sector, regarding the scope, intent and ramifications of existing regulations and subsequent enforcement of commercial drivers and commercial motor vehicles. The AHC requests that the Department of Transportation (DOT), Federal Motor Carrier Safety Administration (FMCSA) release a concise and unambiguous statement addressing the equine industry's concerns with compliance. The industry also requests a detailed list of exemptions that may pertain to professional and non-professional equestrians alike.

The equine industry is a robust component of the US economy. According to the *Economic Impact of the Horse Industry in the United States*, a study done for the American Horse Council by Deloitte Consulting, the horse industry has an annual \$102 billion impact on the U.S. economy and supports 1.4 million jobs. In a given year in the U.S., there are 8 million people who ski, 23 million people play tennis, 25 million who play golf, and 27 million people who will ride a horse. The majority of these individuals do not transport horses as part of a business, and yet many of them fear that enforcement will begin targeting them specifically because of the vehicle they drive or the destination of their trip.

The AHC has requested clarification of the regulations from the DOT in the past in an effort to develop educational resources for the trailer hauling public. Receiving none, the AHC has developed two brochures outlining the stipulations and potential exemptions of both Commercial Drivers Licenses (CDL) and Electronic Logging Devices (ELD). While our points are taken directly from the Federal Registrar, concerns continue in light of the confusing and ambiguous language coupled with the disparate follow-through at the state level. These issues have made compliance a complicated path to follow, and one which is not transparently structured to protect animals or the individuals hauling them.

We are looking forward to working together to make the public more aware of their position within this issue. We suggest increased stakeholder involvement in any further discussions within the department concerning future regulatory efforts that impact the equine industry. Please contact the American Horse Council if you would like to discuss this further.

Sincerely,

Julie Broadway, President