



Owner-Operator Independent Drivers Association, Inc.

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July 30, 2010

California Highway Patrol

Commercial Vehicle Section

Attn: Mr. Gary Ritz

P.O. Box 942898

Sacramento, CA.

94298-0001

Re: Modified Notice of Proposed Regulatory Action: Motor Carrier Safety/Carrier Identification (CHP – R – 09 -15) Adoption of New Section 1235.7, Leased Vehicles.

The Owner-Operator Independent Drivers Association (OOIDA) originally filed comments on July 20, 2009 in support of the adoption of Section 1235.7. Additionally, we participated in the public hearing related to this issue on October 15, 2009. We have been supportive of adoption of leasing regulations that mirror 49 C.F.R Part 376 for California intrastate motor carriers. The adoption of regulations by the California Highway Patrol (CHP) that defines the leasing relationship between a motor carrier and owner-operator is consistent with the Mission Statement of CHP to provide the highest level of safety...to the people of California.

While OOIDA disagrees with the conclusions justifying the omissions of certain Subsections that were originally included in this proposed regulation, we commend CHP for recognizing the nexus between improving highway safety and adopting meaningful leasing regulations that apply to intrastate operators.

OOIDA supports adoption of Section 1235.7 as is currently proposed.

Sincerely,

JAMES JOHNSTON
President