

September 5, 2014

Comments of Renzenberger Inc regarding the third set of proposed rules related to the complete rewrite of Title 291, Chapter 3, Motor Carrier Rules and Regulations.

Renzenberger Inc. is a contract carrier that transports train crews for various railroad customers. We are required by contract to comply with all pertinent laws related to the services we provide. Our contracts also require us to indemnify our customers for injury or death to railroad employees, regardless of who is at fault in an accident. The contracts require Renzenberger to maintain commercial general liability and automobile liability insurance coverage in amounts at least equal to \$1.0m for each occurrence. Accordingly, Rule 006.02A proposal to include higher uninsured / underinsured insurance coverage for carriers providing transportation of railroad train crews would only serve to add additional financial burden to the contract carriers, and would not provide any additional protection for injuries incurred involving such carriers.

Sincerely,

Charlotta Duffy
Risk Manager
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Cc: Sandy Walker, Chief Administrative Officer