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September 21, 2022

Richard Clemente
Driver and Carrier Operations Division
Office of Carrier, Driver, and Vehicle Safety Standards
U.S. Department of Transportation

Dockets Operations
U.S. Department of Transportation
1200 New Jersey Avenue SE, West Building
Ground Floor, Room W12-140
Washington, DC 20590-0001

RE: Docket No. FMCSA-2022-0189

Dear Mr. Clemente:

The National Cotton Council (NCC) is the central organization of the United States cotton industry. Its members include producers, ginner, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen, and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from California to Virginia. U.S. cotton producers cultivate between 10 and 14 million acres of cotton, with production averaging 17 million 500-lb bales annually. In addition to the cotton fiber, cottonseed production averages 5.5 million tons annually. Cottonseed and its products are used for livestock feed, and cottonseed oil is used as an ingredient in food products and cooking oil. The direct and indirect economic activity generated by the U.S. cotton industry is \$75 billion annually.

The National Cotton Council supports the continued COVID-19 Emergency Declaration, Regulatory Relief for Commercial Motor Vehicle Operations. With the nation's supply chain still in flux, it is imperative that the transportation of qualifying agricultural commodities to the cotton industry's end-users is not impeded by the hours-of-service rule requirements that were in place pre-pandemic.

While the agricultural exemption to the hours-of-service rules provides some flexibility for movements of fewer than 150-air miles, it provides no relief for longer movements. Trucks may be used to transport commodities from warehouses located in the states where the cotton is produced. From there, the products may be trucked to another warehouse to be consolidated before being shipped to processors or international maritime export gateways. While some cottonseed and cottonseed products are shipped by rail, trucks are used to transport these products to important livestock feed and cooking oil markets. In fact, trucks are the primary transportation method used by gins for shipments of cottonseed to processors or to cottonseed

feed merchandizer storage facilities. In many of these cases, cottonseed and cottonseed products are often shipped well beyond 150 miles.

We believe that an extension of the current emergency declaration would continue to help ensure that there are no major disruptions in the supply chain, and the extension of the current emergency declaration can be accomplished without adversely impacting transportation safety.

Thank you for allowing the National Cotton Council the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in cursive script that reads "Gary M. Adams".

Gary M. Adams
President & CEO
National Cotton Council