

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Commission, on its ) Rule and Regulation No. 182  
own motion, seeking to amend Title 291, )  
Chapter 3, Motor Carrier Rules and )  
Regulations, to rewrite the chapter in its ) **COMMENTS**  
entirety. )  
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Camelot Transportation, Inc.; and Triumph Transportation, Inc. (collectively, **Camelot**) by and through their attorneys of record, hereby respectfully submit these comments to the Nebraska Public Service Commission (“**Commission**”), pursuant to the *Order Releasing Fifth Set of Proposed Rules for Comment*, entered July 21, 2015. Camelot appreciates the commission modification of Rule 003.01D, defining Open Class Service, to address concerns raised earlier by Camelot. Other concerns Camelot raised, however, were not addressed. As discussed specifically below, Camelot continues to request the proposed rules be modified to address those concerns.

**Proposed Rule 001.02 – Deadline for Hearing**

Camelot renews the recommendation made in its *Comments* submitted January 9, 2015, in response to the Commission’s *Order Releasing Fourth Set of Proposed Rules*, to include the following rule to ensure Commission decisions are rendered in transportation matters on a timely basis:

In proceedings subject to the requirements of this chapter, an order shall be issued no later than one month following the final date of the hearing, except for good cause shown.

**Proposed Rule 010.01E – Trip Logs**

As stated in Camelot’s *Comments* of January 9, 2015, dispatch technology has changed in such a way as to render trip logs obsolete. For example, tablets used by many

carriers and, at present, required by DHHS broker IntelliRide, eliminate the need for trip logs. In such instances, electronic records are made and maintained, containing information formerly contained in paper trip logs. Such practice should not require Commission approval as required in the proposed rule. For that reason, the proposed rule should be amended accordingly.

**Proposed Rule 010.01F – Receipts**

As stated in Camelot’s Comments of January 9, 2015, technology has changed in such a way as to render paper receipts obsolete. For this reason, this requirement should be eliminated or at least changed to no longer require paper receipts on demand.

**Dated:** August 20, 2015.

**CAMELOT TRANSPORTATION, INC. and  
TRIUMPH TRANSPORTATION, INC.**

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