

**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**”), as directed by the Commission at its hearing of December 5, 2014.

**Proposed Rule 001.02 – Deadline for Hearing**

As stated at the December 5 hearing, Camelot appreciates the Commission’s efforts to expedite hearings in transportation proceedings. Equally important is ensuring the decisions are rendered in such matters on a timely basis. For this reason, Camelot recommends inclusion of the following rule:

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 003.01D – Definition of Open Class Service**

The proposed addition of subsection 003.01D1 would not permit mileage-based charges to be “augmented or enhanced through any calculation that does not reflect actual mileage traveled.” Camelot and other authorized common carriers providing Open Class service charge base rates that do not necessarily reflect actual mileage traveled. The Commission has expressly approved these rates. Some, but not all, of the services that are subject to such base rates are provided to clientele of the Department of Health and Human

Services (“DHHS”). Imposing the restriction proposed in subsection 003.01D1 would create a hardship for carriers and passengers alike, who recognize the value of a certain and knowable base rate, which may encompass the entirety of the service charge.

Knowing no purpose served by prohibiting the base rate practice to continue, Camelot recommends striking the second sentence of proposed section 003.01D1.

**Proposed Rule 010.01E – Trip Logs**

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 mentioned above with reference to trip logs, 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:** January 9, 2015.

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

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