



# DUMP TRUCK CARRIERS CONFERENCE

NEWSLETTER

VOL. 57

September 2012

## THE MAN RULES

At last a guy has taken the time to write this all down. We have heard "THE RULES" from the female side...Now here are the rules from the male side, in no particular order:

- Men are NOT mind readers.
- Ask for what you want. Let us be clear on this one: Subtle hints do not work! Strong hints do not work! Obvious hints do not work! Just say it!
- Learn to work the toilet seat. You don't hear us complaining about you leaving it down.
- Crying is blackmail.
- Yes and No are perfectly acceptable answers to almost every question.
- Anything we said 6 months ago is inadmissible in an argument. In fact, all comments should become null and void after 7 days.
- If something we said can be interpreted two ways and one of the ways makes you sad or angry, we meant the other way.
- Whenever possible, please say whatever you have to say during commercials.
- If we ask what is wrong and you say "nothing," we will act like nothing's wrong. We know you are lying, but it is just not worth the hassle.

- When we have to go somewhere, absolutely anything you wear is fine...Really.
- I am in shape. Round is a shape.
- Don't ask us what we're thinking about unless you are prepared to discuss such topics as football, hockey, Talledega or Maria Sharapova.

Thank you for reading this. Yes Mary, I know I have to sleep on the couch tonight. But did you know men really don't mind that? It's like camping.

## DID YOU KNOW?

- Q:** What is the fine or penalty for employers who refuse or fail to provide Part 382 alcohol and drug testing information to a subsequent employer when requested?
- A:** Title 49 U.S.C. 521(b)(2)(A) provides for civil penalties not to exceed \$500 for each instance of refusing or failing to provide the information required by 382.405. Criminal penalties may also be imposed under 49 U.S.C. 521(b)(6).

### QUOTABLE

"You do not need a parachute to skydive.  
You only need a parachute to skydive twice."

- Anonymous

## **GENERAL INFORMATION**

### **"REINCARNATION"**

The Federal Motor Carrier Safety Administration has added a new section to its motor carrier regulations under 49 CFR 386.73 that gives the agency added authority to find and close down companies that create new or affiliated companies for the purpose of evading accountability for a poor safety history. Using added authority, companies that misrepresent and/or withhold material information about their operations will face new sanctions by FMCSA.

FMCSA will now be able to issue out-of-service orders to not only motor carriers, but brokers, freight forwarders, and intermodal equipment providers if the operations are determined to be reincarnations of an earlier version of a company looking to hide from its poor performance record.

Procedures are being established to consolidate the compliance records of reincarnated or affiliated operations.

### **DUMP TRUCK CARRIERS CONFERENCE NEWSLETTER**

Published quarterly by  
Dannemiller Associates, Inc.  
7792 Olentangy River Road, Suite F-2  
Columbus, Ohio 43235  
(614) 431-8740  
Fax: (614) 431-8742  
Website: Dannemiller.US  
E-mail: Larry@Dannemiller.US

Material in this Newsletter may not be reprinted without permission.

Submissions by members and interested parties are welcome.

Dump Truck Carriers Conference is a registered trade name of Dannemiller Associates, Inc.

### **OOIDA SUES FMCSA OVER DRIVER SAFETY RECORDS**

*(By: Tony Palmer, AldenLaw)*

OOIDA and four commercial truck drivers filed a lawsuit against the FMCSA on July 13, 2012, in the United States District Court for the District of Columbia. OOIDA and the plaintiff drivers allege that the FMCSA failed to remove driver violations from the MCMIS System. Three of the plaintiff drivers had citations in which a court either dismissed the charge or found the driver not guilty. Currently, the agency is not required to remove a dismissed citation.

In these cases, state enforcement officials refused to remove the violations from the MCMIS System after a DataQ challenge. In the lawsuit, OOIDA claims that the continued reporting of these violations is in contravention of the Fair Credit Reporting Act, the Privacy Act, and other provisions of federal law. All drivers and motor carriers will benefit if OOIDA is successful in obtaining a court order that requires FMCSA to purge violations from the MCMIS System where there is no judicial determination of guilt, the citation was dismissed, or the driver was found not guilty by a court. As yet there is no indication of which way the court is leaning. AldenLaw supports the plaintiffs' position, and have long argued that the current position of the FMCSA is contrary to law.

### **HOURS-OF-SERVICE INTERIM REMINDER**

July 1, 2013, is the deadline for complying with portions of the new Hours-Of-Service rules for drivers of property-carrying vehicles, as adopted on December 27, 2011. Drivers will need a 30-minute off-duty break at least every 8 hours in order to continue driving commercial vehicles, and will have limits imposed on their use of the 34-hour "restart" options.

## GENERAL INFORMATION

### CONGRESS CONSIDERS EOBR MANDATE

Powerful interests in the trucking, automotive, and roadside enforcement communities are voicing their support for an electronic on-board recorder (EOBR) mandate now making its way through Congress.

The Senate version of a proposed multi-year transportation funding bill directs the Federal Motor Carrier Safety Administration (FMCSA) to require all interstate commercial motor vehicles to be equipped with EOBRs within three years. The devices are used to track drivers' Hours-Of-Service in an effort to prevent fatigued driving.

The Commercial Vehicle Safety Alliance (CVSA), the American Automobile Association, and the American Trucking Associations are among the groups urging Congress to pass the EOBR requirement. You can be sure equipment lobbyists are well represented.

Hours-Of-Service compliance is far and away our largest driver-related safety challenge," said Stephen A. Depler, CVSA's executive director.

#### PREVIOUSLY RECORDED CONVERSATION

**Iranian Air Defense Site:** "Unknown aircraft you are in Iranian airspace. Identify yourself."

**Aircraft:** "This is a United States aircraft. I am in Iraqi airspace."

**Air Defense Site:** "You are in Iranian airspace. If you do not depart our airspace will be launch interceptor aircraft!"

**Aircraft:** "This is a United States Marine Corps FA-18 fighter. Send 'em up, I'll wait!"

**Air Defense Site:** (...total silence)  
God bless our troops. There is something about a Marine that makes other countries listen to reason.

### NJ COURT RULES ON INDEPENDENT STATUS

*(From ATA'S Truckline)*

A federal court in New Jersey dismissed a federal Fair Labor Standards Act class action suit filed against Ironbound Express by independent operators who claimed that they were misclassified. The American Trucking Association, along with the New Jersey Motor Truck Association, filed an amicus brief in the case, arguing that under the "right of control" standard, the plaintiff drivers were properly deemed independent contractors.

The court agreed: It applied a six-factor test to determine whether the drivers were independent contractors or employees. The Court concluded that four of those factors (right of control; opportunity for profit or loss; investment in equipment; and special skill requirements) weighed in favor of independent contractor status, while only two of the factors (permanence of working relationship; and degree to which the service is integral to the business) were suggestive of an employer-employee relationship. On balance, the court held that "the circumstances of the whole activity" demonstrated that the drivers were independent contractors and dismissed their claims.

### \$55,000 OSHA FINE

An Alabama trucking company has been cited by the U.S. Occupational Safety and Health Administration (OSHA) for 17 safety violations, with a proposed penalty of \$56,700.

The Ashford-based company was the subject of an OSHA inspection earlier this year that uncovered 13 serious violations, including:

- Failing to perform a personal-protective-equipment hazard assessment;

## **GENERAL INFORMATION**

### **\$55,000 OSHA FINE (Continued)**

- Failing to provide an eyewash station for workers exposed to corrosive chemicals;
- Failing to provide fire-extinguisher training;
- Failing to provide training for forklift operators;
- Failing to provide guarding on a bench grinder and around an open pit;
- Failing to reduce the pressure on an air hose to less than 30 pounds per square inch for cleaning;
- Failing to store oxygen and acetylene cylinders at least 20 feet apart;
- Failing to provide a hazard communication program;
- Improper use of electrical equipment;
- A missing inner electrical panel; and
- Failing to provide weatherproof enclosures for outlets in damp and wet locations.

A "serious" violation occurs when there is substantial probability that death or serious physical harm could result from a hazard about which the employer knew or should have known.

### **OWNER OPERATORS FIGHT NEW OOS CRITERIA FOR FATIGUE**

(OOIDA) has asked a federal court to rule that the Minnesota State Patrol (MSP) and the Commercial Vehicle Safety Alliance (CVSA) are in contempt of court for placing drivers Out-

Of-Service based on suspicion of fatigue rather than probable cause.

In April of this year, the CVSA began using revised Out-Of-Service (OOS) criteria in their roadside inspections which state:

*"When so fatigued that the driver of a commercial motor vehicle should not continue the trip based on reasonable, articulable suspicion...declare the driver Out-Of-Service until no longer fatigued."*

OOIDA claims that this standard violates a court order issued in September 2011. The U.S. District Court for the District of Minnesota ruled that during inspections, law enforcement personnel cannot expand an inspection to determine impairment unless they have a reasonable, articulable suspicion that the driver may be impaired. Drivers cannot then be ordered Out-Of-Service for fatigue or illness unless there is probable cause to believe that they are unsafe and an imminent risk to public safety.

"The amended criteria is in direct conflict with the court's ruling," said Johnston. "It basically gives police the ability to put a driver Out-Of-Service for any or no reason."

OOIDA asked the court to require the CVSA and MSP to appear and defend why they should not be held in contempt for violating the court's September ruling.

The organization has also asked the Federal Motor Carrier Safety Administration to purge all Out-Of-Service reports since April 1, 2012, when the amended OOS criteria went into use.

## **GENERAL INFORMATION**

### **FMCSA ENCOURAGING TRAFFIC STOPS FOR CMV'S**

Commercial motor vehicles (CMV's) that violate traffic laws should be stopped, federal regulations say, even if the officer is not a trained CMV inspector.

To assist state and local enforcement officers in making such traffic stops, the Federal Motor Carrier Safety Administration (FMCSA) has issued a series of educational materials available on its website.

The FMCSA says its "CMV Awareness" self-study program is designed to inform law enforcement officials of the "critical need to safely stop CMV's that violate traffic laws."

The three-part program outlines the basic requirements to complete a CMV traffic stop and to determine what to do if a violation has occurred.

In addition to three videos, a written guide walks officers through a typical CMV traffic stop and advises them to contact a certified CMV inspector when they think the vehicle needs further inspection. The program is available at <http://1.usa.gov/L84YBX>.

### **HEALTH AGENCY SAYS DIESEL EXHAUST CAUSES CANCER**

A division of the World Health Organization recently declared diesel exhaust to be carcinogenic to humans.

The International Agency for Research on Cancer (IARC) - which declared diesel exhaust to be a "probable" carcinogen in 1998 - now says there is sufficient evidence to declare that exposure to diesel exhaust is associated with an increased risk for lung cancer.

According to the IARC, there has been

mounting concern about the cancer-causing potential of diesel exhaust, particularly based on findings in epidemiological studies of workers exposed in various settings. As recently as March 2012, a large U.S. government study of occupational exposure to diesel emissions in underground miners showed an increased risk of death from lung cancer in exposed workers.

An IARC working group found that diesel exhaust appears to cause lung cancer and is associated with an increased risk of bladder cancer as well. The group also says gasoline exhaust is "possibly" carcinogenic to humans.

"The scientific evidence was compelling and the Working Group's conclusion was unanimous; diesel engine exhaust causes lung cancer in humans," said Dr. Christopher Portier, chair of the IARC working group. "Given the additional health impacts from diesel particulates, exposure to this mixture of chemicals should be reduced worldwide."

The IARC urges governments and other decision-makers to consider environmental standards for diesel exhaust emissions.

### **WHAT IF YOU ARE MISSING DRIVER VEHICLE INSPECTION REPORT (DVIR)**

**Q:** In instances where the DVIR has not been prepared or cannot be located, is it permissible under 396.11 for a driver to prepare a DVIR based on a pre-trip inspection and a short drive of a motor vehicle?

**A:** Yes. 396.11 of the FMCSRs places the responsibility on the motor carrier to require its drivers to prepare and submit the DVIR. If, in unusual circumstances, the DVIR has not been prepared or cannot be located the motor carrier may cause a road test and inspection to be performed for safety of operation and the DVIR to be prepared.

## **QUESTIONS AND ANSWERS**

**HOURS-OF-SERVICE WITHIN 100 AIR-MILE RADIUS EXEMPT ZONE** (in which CMV drivers are not required to prepare daily logs).

1. **Q:** What drivers may take advantage of the 100 air-mile radius exemption found at CFR Part 395.1(e)?
- A:** Drivers (single or spot-shifts) may take advantage of the 100 air-mile radius exemption if:
- (1) The drivers operate within a 100 air-mile radius of their normal work-reporting locations;
  - (2) The drivers return to their work-reporting locations and are released from work at the end of each shift and each shift is less than 12 consecutive hours;
  - (3) The drivers are off-duty for more than 10 consecutive hours before reporting for their first shift of the day and spend less than 12 hours, in the aggregate, on-duty each day;
  - (4) The drivers do not exceed a total of 11 hours driving time and are afforded 10 or more consecutive hours off-duty prior to their first shift of the day; and
  - (5) The employing motor carriers maintain and retain the time records required by 395.1(e)(5).
2. **Q:** What constitutes the 100 air-mile radius exemption?
- A:** The term "air-mile" is internationally defined as a "nautical mile" which is equivalent to 6,076 feet/1,852 meters. Thus, the 100 air-miles are equivalent to 115.08 statute-miles or 185.2 kilometers.
3. **Q:** What documentation must a driver claiming the 100 air-mile radius exemption (395.1(e)) have in his/her possession?
- A:** None.
4. **Q:** When must a driver prepare a record of duty status for a day when the driver exceeds the 100 air-mile radius exemption criteria?
- A:** A driver must begin to prepare the record of duty status for the day immediately after he/she becomes aware that the terms of the 100 air-mile radius exemption cannot be met.
5. **Q:** When a driver fails to meet the provisions of the 100 air-mile radius exemption is the driver required to have copies of his/her records of duty status for the previous seven days? Must the driver prepare daily records of duty status for the next seven days?
- A:** The driver must only have in his/her possession a record of duty status for the day he/she does not qualify for the exemption. The record of duty status must cover the entire day, even if the driver has to record retroactively changes in status that occurred between the time that the driver reported for duty and the time in which he/she no longer qualified for the 100 air-mile radius exemption. This is the only way to ensure that a driver does not claim the right to drive 11 hours after leaving his/her exempt status, in addition to the hours already driven under the 100 air-mile exemption.

## **HOURS-OF-SERVICE**

# **HOURS-OF-SERVICE EXEMPTIONS INTRASTATE OHIO**

### *1. Road Work Exemption*

"Operation of motor vehicles for contractors on public roadways," are exempt from Hours-Of-Service regulations, Driver Qualification (except CDL and Drug Testing) and Inspection and Maintenance. Exemption has been interpreted to include?

- (a) Drivers for contractors.
- (b) Drivers of motor common carriers, or owner-operators with proper leases working for the contractor.
- (c) Owner-operators working for the motor carrier who works for the contractor.

### *2. Private Carriers Of "Construction Materials and Equipment" Exemption*

Drivers for Private Carriers of "Construction Materials and Equipment", operating within 50 miles of the drivers normal reporting location have been granted expanded maximum Hours-Of-Service as shown below:

Driver Status & Company Operating Schedule	Standard Operations (Non-Exempt)	Construction Exempt Operations
	MAXIMUM	
Driving	11 Hours	12 Hours
On-Duty	14 Hours	16 Hours
7-Days	60 Hours	70 Hours
8-Days	70 Hours	80 Hours

# COMPARISON OF EXEMPTIONS FOR COMMON AND PRIVATE CARRIERS

## HOURS-OF-SERVICE

### HOURS-OF-SERVICE

Analysis of Ohio Intrastate Hours-Of-Service Regulations											
Type Of Operation	Common Carrier						Private Carrier				
	Log Required	Hourly Maximums			Log Required	Hourly Maximums					
		Driving Time	Daily On-Duty Time	7-Day Max.		8-Day Max.	Driving Time	Daily On-Duty Time	7-Day Max.	8-Day Max.	
<b>Standard Transportation Operation:</b> Within 100-air mile radius# Outside 100-air mile radius	No	11	12 $\phi$	60	70	No	11	12 $\phi$	60	70	70
	Yes	11	14	60	70	Yes	11	14	60	70	70
	No	11	12 $\phi$	60	70	No	12	16	70	70	80
<b>Transportation of Construction Materials:</b> Within 50-air mile radius Outside 50-air mile radius Outside 100-air mile radius	No	11	12 $\phi$	60	70	No	11	12 $\phi$	60	70	70
	No	11	12 $\phi$	60	70	No	11	12 $\phi$	60	70	70
	Yes	11	14	60	70	Yes	11	14	60	70	70
<b>Public Road Work</b>	No	Exempt (No Limits)				No	Exempt (No Limits)				

# - Driver must be within the 100-air mile radius, and also must be released from duty within 12 hours of starting time.  
 $\phi$  - 14 hours if log is completed for that day.



### THE "PROPER" TAX RATE

(by Larry Dannemiller)

*"The problems we face today are there because the people who work for a living are outnumbered by those who vote for a living."*

- Anonymous

I'm not sure we are there yet, but statistics say we are very close. Only 49% of eligible Americans paid Federal Income Tax in 2011. It has not gotten any better in 2012. At one point last spring as many people were put on SSI Disability each month as were getting jobs. We can only guess how long that can continue.

Raising taxes on the rich seems to be a popular idea right now. I am convinced this is primarily political maneuvering, because over time higher tax rates have not produced higher tax revenue as a percentage of Gross Domestic Product (GDP), and I would think most politicians, or their advisors, know this.

There is more than the usual rhetoric in this presidential campaign about whether we should or should not raise taxes on the most successful people. Some of our politicians would like us all to be resentful of the fact that Bill Gates has a house the size of Rhode Island. I'm not. Before discussing this, one point needs to be clear. Whether you like it or not, our present tax policy impacts higher income people more, as a percentage of their income, than the lower income folks. The top 10% of income earners paid 71% of all federal income taxes in 2009 while earning 43% of all income. The top 5% paid 59% of all federal income taxes while earning 32% of all income. The bottom 50% of earners paid 2% of federal income taxes while earning 13% of total income. Yes, you read it correctly - "paid 2%." Even before you take into account the people who pay no federal taxes our tax system is extremely progressive.

It should be no surprise that when you raise tax rates, investors and taxpayers change their financial strategy and behavior accordingly.

When capital gains rates are increased, investors are slower to take gains. So despite a higher tax rate, the actual revenue may not go up,...in fact may go down. Conversely, when capital gains tax rates are reduced, investors are quicker to take gains resulting in higher tax revenues.

In the heart of the recession, 2009, 2010, federal tax revenues fell to 15% of GDP. However, they are headed back up. In 2011 it was 15.4%, in 2012 it is projected at 16.3%.

In the United States we have not had tax revenues of more than 20% of GDP for any significant length of time since 1960, even though we have had significantly higher tax rates. At one time the top marginal tax rate was 91%, and even then tax revenues as a percent of GDP remained around the historical average of 18%. It just doesn't seem to matter.

We know from history that soaking the rich by raising their tax rates almost always results in reduced economic activity which hurts everyone, including those to whom the politicians are attempting to incite with class rhetoric. We also know from the Kennedy, Reagan, and Bush tax cuts that, regardless of the era, reducing tax rates in a faltering economy can accelerate economic activity and GDP growth.

Is there an "optimum" tax rate schedule that would maintain tax revenues at 18% - 20% of GDP while allowing for maximum GDP growth? I don't know. I'm not that smart, but I'll bet somebody is; and if we could just determine that "proper" level and lock it in, untouchable, forever without political interference, we would not only enjoy economic growth (and increased tax revenues) but eliminate a majority of liberal political bombast. I would be willing to pay more, if necessary, just for that benefit.



# DUMP TRUCK CARRIERS CONFERENCE

## MEMBERSHIP LISTING

### CARRIER MEMBERS

Mr. Aaron Jones  
AARON JONES TRUCKING  
P. O. Box 186  
Spring Valley, Ohio 45370  
(937) 488-2075

Mr. Leroy J. Robbins  
AUGUST ROBBEN SONS, INC.  
6500 Bender Road  
Cincinnati, Ohio 45233  
(513) 941-7500

Mr. Abu Bundu  
BAKARR ENTERPRISES, INC.  
935 Wake Drive  
Westerville, Ohio 43082-8539  
(614) 898-7214

Mr. Jim Knisely  
BERNER TRUCKING, INC.  
P. O. Box 660  
Dover, Ohio 44622  
(330) 343-5812

Mr. Thomas Boyd  
BOYD BROS., INC.  
Box 118  
Fredericktown, Ohio 43019  
(614) 694-5916

Mr. Bill Berger  
CTS, INC.  
P. O. Box 870  
Mt. Vernon, Ohio 43050-0870  
(740) 397-9191

Mr. Daniel Zarlenga  
C-Z TRUCKING CO.  
9495 Harvard Boulevard  
Youngstown, Ohio 44514  
(330) 758-2313

Mr. Christopher A. Scala  
CRYSTAL SPRINGS  
MATERIALS, INC.  
9500 Forty Corners Road NW  
Massillon, Ohio 44647  
(330) 494-6455

Mr. Gary Nye  
FA NYE & SON'S  
ENTERPRISES  
P. O. Box 398  
Bettsville, Ohio 44815  
(419) 986-5400

Mr. Shawn Henderson  
HENDERSON TRUCKING, INC.  
124 Henderson Court  
Delaware, Ohio 43015  
(740) 369-6100

Mr. Bari Henning  
HENNING TRUCKING  
3618 Bootjack Road  
Williamsburg, Ohio 45176  
(513) 724-2994

Mr. Todd Hiney  
HINEY TRUCKING LTD.  
1101 S. Columbus Street  
Xenia, Ohio 45385  
(937) 372-9960

Mr. John Grattino  
J.T. TRUCKING, INC.  
19070 Haskins Road  
Chagrin Falls, Ohio 44023-605  
(216) 663-7002

Mr. Joe Stenger  
J.W. STENGER TRUCKING, INC.  
61485 Professional Drive  
Barnesville, Ohio 43713  
(800) 837-8364

Mr. Dick Jones, President  
THE JONES FUEL CO.  
350 Frank Road  
Columbus, Ohio 43207  
(614) 443-4611

Mr. Richard E. Jones, Jr.  
JONES TRANSPORTATION CO.  
2610 Crescentville Road  
West Chester, Ohio 45069  
(513) 326-6000

Mr. Bill Kerr  
KERR TRUCKING, INC.  
705 State Route 302  
Ashland, Ohio 44805  
(419) 289-9275

Mr. Bryan Monesi  
MONESI TRUCKING &  
EQUIPMENT REPAIR, INC.  
1715 Atlas Street  
Columbus, Ohio 43228-9648  
(614) 921-9183



# DUMP TRUCK CARRIERS CONFERENCE

## MEMBERSHIP LISTING

### CARRIER MEMBERS

Mr. Tim Patrick  
PATRICK EXCAVATING, INC.  
5839 S.R. 5  
Ravenna, Ohio 44266  
(330) 296-7706

Mr. Rick Kuntz  
RICK KUNTZ TRUCKING, INC.  
9056 State Route 88  
Winham, Ohio 44288  
(330) 296-9311

Mrs. Suzette Hamlin  
VIKING TRUCKING, INC.  
Box 25, 19-929 Rd. T  
Ridgeville Corners, Ohio 43555  
(419) 267-3319

Mr. Paul Adelman  
PAUL ADELMAN TRUCKING  
P. O. Box 370  
1250 Hartville Road  
Randolph, Ohio 44265  
(330) 325-7470

Mr. Ben Morabito, Jr.  
S.B. MORABITO TRUCKING  
COMPANY  
3560 East 55th Street  
Cleveland, Ohio 44105  
(216) 441-3070

Mr. Dan Vorst  
VORST PAVING & LEASING,  
INC.  
14373 Road 23M  
Cloverdale, Ohio 45827  
(419) 453-3166

Mr. Mark Carrocce  
R & J TRUCKING  
8063 Southern Boulevard  
P. O. Box 9454  
Youngstown, Ohio 44513  
(330) 758-0841

Mr. Brad Smith  
SMITH MATERIAL SUPPLY,  
INC.  
1571 N. Main Street  
Marion, Ohio 43302  
(740) 382-4148

Mr. Michael D. Hodson  
W.A. HODSON, INC.  
P. O. Box 412  
Leesburg, Ohio 45135  
(937) 780-4272

Mr. Dave Jackson  
REDBANK TRANSPORT, INC.  
910 U.S. Route 50  
Milford, Ohio 45150  
(513) 831-5491

Mr. Kim Testa  
TESTA TRUCKING, INC.  
4381 Newhouse Road  
Ostrander, Ohio 43061  
(740) 666-1920

### ASSOCIATE MEMBERS

#### Legal Services:

John Alden, Esquire  
ALDEN LAW  
One East Livingston Avenue  
Columbus, Ohio 43215-5700  
(614) 221-1306

#### Legal Services:

Mr. L. Christopher Bobbit  
SANBORN, BRANDON, DUVALL  
& BOBBITT CO., L.P.A.  
2515 West Granville Road  
Columbus, Ohio 43235  
(614) 889-2531

#### Medical Services:

Ms. Lorri Smith  
INTEGRITY TESTING &  
SAFETY ADMINISTRATORS  
6015 19 Mile Road  
Sterling Heights, Michigan 48314