

estimates of total long-haul and short-haul drivers subject to this final rule.

TABLE 5.—CHANGES IN DRIVERS NEEDED IN RESPONSE TO HOS LIMITS RELATIVE TO CURRENT RULES WITH FULL COMPLIANCE

[Values in parentheses are negative]

	PATT	ATA	FMCSA
Percentage Change:			
Long-haul .....	4.0%	(5.3)%	(3.9)%
Short-haul .....	7.7%	(0.4)%	0.7%
Numbers:			
Long-haul .....	60,000	(79,500)	(58,500)
Short-haul .....	115,500	(6,000)	10,500
Total .....	175,500	(85,500)	(48,000)

Source: RIA Exhibit 9–1.

Table 6 (RIA Exhibit 9–2) shows, for the long-haul sector, the cost implications of the changes in drivers shown in Table 5 (RIA Exhibit 9–1). The cost changes are divided into directly driver-related cost changes, and the costs of non-driver related changes that are necessary as a result of the changes in numbers of drivers. For each alternative, there are costs related to

new driver wages and benefits, which counteract the changes in wages and benefits for current drivers whose hours of work have changed. The net cost (or cost savings) for the drivers comes about because the per-hour cost of work that has been shifted between existing drivers and newly hired drivers is not the same for the two groups: average employment costs for newly hired

drivers tend to be higher than the per-hour cost of extra hours for existing drivers, in part because of fixed payroll costs (*e.g.*, benefits) per driver. Other costs include costs for purchasing, maintaining, insuring, and parking additional tractors and trailers for the new drivers, and hiring a larger staff of non-driving personnel to handle larger numbers of drivers.

TABLE 6.—DIRECT COST CHANGES—LONG-HAUL

[(Millions of dollars per year) (Values in parentheses are negative)]

Cost category	PATT	ATA	FMCSA
Driver Labor Cost .....	287	(792)	(636)
Avoided Labor Wages .....	(1,953)	2,258	1,546
Avoided Labor Benefits .....	(117)	136	92
New Labor Wages .....	1,799	(2,433)	(1,736)
New Labor Benefits .....	558	(754)	(538)
Other Costs .....	478	(563)	(437)
Non-driver Labor .....	11	(32)	(25)
Trucks .....	228	(216)	(179)
Parking .....	54	(72)	(53)
Insurance .....	40	(52)	(39)
Maintenance .....	70	(93)	(68)
Recruitment .....	75	(99)	(73)
Total Costs .....	764	(1,356)	(1,073)

Table 7 (RIA Exhibit 9–3) shows similar calculations for short-haul

operations, and Table 8 (RIA Exhibit 9–4) reports total direct cost changes.

TABLE 7.—DIRECT COST CHANGES—SHORT-HAUL

[(Millions of dollars per year) (Values in parentheses are negative)]

Cost category	PATT	ATA	FMCSA
Driver Labor Cost .....	1,557	(38)	90
Avoided Labor Wages .....	(3,655)	165	(298)
Avoided Labor Benefits .....	(219)	10	(17)
New Labor Wages .....	3,798	(150)	309
New Labor Benefits .....	1,633	(64)	96
Other Costs .....	1,038	(49)	78
Non-driver Labor .....	62	(2)	4
Trucks .....	517	(23)	33
Parking .....	105	(5)	10
Insurance .....	76	(4)	7
Maintenance .....	134	(7)	12