Good afternoon Chairman Rafferty, Chairman Wozniak and members of the committee.

I’m Scott Mugno, vice president of safety and vehicle maintenance for FedEx Ground. On behalf of our management team and thousands of independent service providers with which we contract for transportation services, thank you for the opportunity to address a very important topic for our companies, our industry and the motoring public at large -- safety.

Headquartered in Pittsburgh, FedEx Ground specializes in low-cost, day-definite small package ground delivery across the U.S. and Canada. FedEx Ground operates a multiple hub-and-spoke sorting and distribution system consisting of more than 560 facilities, including 33 hubs that employ 70,000 people and contract with 7,000 independent service providers for linehaul and pickup-and-delivery services. More than 47,000 vehicles are deployed throughout the FedEx Ground network each day to handle an average volume of seven million packages a day.

In Pennsylvania alone, FedEx Ground operates 20 facilities staffed by more than 4,000 employees. The 350 local independent businesses that provide contracted transportation services for FedEx Ground own and operate more than 1,500 vehicles and log over 60 million miles annually on Pennsylvania roads to transport roughly 100 million packages a year.

Our Safety Commitment
FedEx Ground is committed to putting safety above all while providing a highly-valued service to millions of businesses and consumers. Safety is our top priority, both within our operating company and across our network of vendors and service providers. We maintain strict safety standards and have been recognized for our performance by the American Trucking Associations and numerous state trucking associations.

With multiple operations and millions of customers throughout the northeast, FedEx Ground is well aware of the hazardous weather conditions that can be created by the harsh winter season. We recognize that as a commercial motor carrier, we have a responsibility to ensure that all those who provide transportation services on our behalf share the roadways as safely as possible with the motoring public, especially where weather challenges exist.

Our commitment to road safety includes the promotion of robust, daily communications designed to raise awareness of our industry’s safety best practices. We also promote continuous advancements in safety through contracting terms and incentives for linehaul contracted service providers to adopt a variety of safety enhancements, including collision mitigation technology, rollover stability systems and video event data recorders, among other emerging technologies.
Contracted service providers have been adopting these technologies for years as part of their safety and compliance programs.

**Snow and Ice Removal**
FedEx Ground acknowledges that heavy snow and ice buildup on trucks and trailers can increase the possibility of an accident on the roadway. To avoid potential road hazards, we deploy a variety of snow-removal methods. A number of our facilities in the northeast are equipped with drive-through scraper systems consisting of two upright beams and an adjustable rubber-tipped plow blade designed to scrape off snow from the top of tractors and trailers when a vehicle passes through the uprights. As necessary, we also use manual methods and private contractors for snow and ice removal services.

These methods, individually, vary in their level of operational difficulty, effectiveness, safety, and economic feasibility. For example, scraper systems may clear snow buildup, but do not always address the often more serious hazard of ice buildup. Manual methods involve the scaling of 13.5’ trailers, which creates the risk of falling and other workplace safety concerns. The use of private contractors may not be practical or economically feasible in many instances.

For the industry as a whole, fixed-location solutions may address only part of the issue. Once a driver leaves a warehouse, for example, the difficulty in addressing weather-related risks can increase, depending on a number of conditions. The 24/7 nature of freight transport means that drivers may be on the road or parked at rest stops for lengthy periods and at all hours, which creates an opportunity for snow and ice to re-accumulate on the top of trailers.

On the other hand, vehicle-based solutions, including portable snow-removal equipment and trailer redesign, are either limited in their effectiveness or are likely years away from practical, industry-wide implementation, respectively.

**Recommended Solutions**
FedEx Ground believes that further study of the issue of snow and ice removal would be a prudent step to ensure that any legislation is fair and, most importantly, effective. While industry and public education campaigns can be effective in raising awareness of the importance of maintaining vehicles that are free from these hazards, mid-to-longer-term solutions should include locating snow-removal devices in turnpike entrances and exits, public rest stops, and weigh stations, and conducting feasibility studies to better assess the functionality and cost-effectiveness of both fixed-location and vehicle-based solutions.