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From: foltzfamfive@aol.com
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To: IRRC
Subject: IRRC #2704 Reg 18-411 Public Comment

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INDEPENDENT REGULATORY
REVIEW COMMISSIONINDEPENDENT REGULATORY
REVIEW COMMISSION

6/28/2008

IRRC:

I would like to file a comment with respect to the Dept. of Transportation's IRRC #2705, Regulation 18-410.
 This section:

(17) Provide a specific estimate of the costs and/or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures which may be required. The proposed change should have no additional costs to school bus drivers or the healthcare providers.

I am not opposed to the regulation, however, there are most certainly additional costs associated with this regulation. The regulation requires two additional HbA1C tests. The lab costs associated with this test are easily \$50-\$100 each time. The employer does not necessarily pay for those tests, and neither does medical insurance if you have large deductibles. It is most certainly an "out of pocket" expense if you have no medical insurance. School bus drivers are ordinarily paid not much more than minimum wage and this is an additional burden.

In addition, there is a cost to the individual and the employer, if they are required to go to the doctor's office for the "reading" of the results of the test. The physician requires a co-pay for that visit and a charge to complete the necessary form. (Again, that assumes you have health insurance.) Also, it is additional time lost from work. Not all individuals that carry this waiver are drivers, some are mechanics that drive only on an as needed basis. The lost time from work is significant.

Please consider the fact that a diabetic driver is already paying for an additional physical at the 6 month period (medical only covers one), plus all of the lab related expenses, office co-pay expenses and form expenses the other two times.

Thank you for your consideration.

Lynn Foltz
 Volant, PA 16156

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7/29/2008