

Stephen Hoffman

From: Corinne Brandt
Sent: Friday, June 01, 2018 9:35 AM
To: Stephen Hoffman
Subject: FW: Department of Transportation Final-Form Regulation #18-479 (IRRC #3200) entitled "Access to and Occupancy of Highways by Driveways and Local Roads"

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Comments on Reg. 3200

From: Elam M. Herr [mailto:eherr@psats.org]
Sent: Tuesday, May 29, 2018 11:14 AM
To: Corinne Brandt
Subject: RE: Department of Transportation Final-Form Regulation #18-479 (IRRC #3200) entitled "Access to and Occupancy of Highways by Driveways and Local Roads"

Corinne: Good morning. We have reviewed the Department of Transportation's Final-Form Regulation #18-479 (IRRC #3200) entitled "Access to and Occupancy of Highways by Driveways and Local Roads," and determined that it will not have an impact on our membership. The proposed changes to Chapter 441 of Title 67 will not affect our membership when they need a township road to access a state highway.

There is one question that needs to be asked. On page 2, Section 441.3 (b), and page 3, Section 441.3 (e) (6) the term "shall" is deleted and replaced with "must." The term "shall" has legal standing and is understood to be mandatory; I am not sure about the term "must." Also, if one reads the rest of the section the term "shall" is constantly used. The question is why the change in terminology?

Besides this question, we have no issues with the proposal. We appreciate the opportunity to comment on these regulations. We look forward to working with IRRC in the future. If you have any questions, please contact me. Elam

From: Corinne Brandt [mailto:cbrandt@irrc.state.pa.us]
Sent: Thursday, May 24, 2018 3:55 PM
To: Corinne Brandt <cbrandt@irrc.state.pa.us>
Subject: Department of Transportation Final-Form Regulation #18-479 (IRRC #3200) entitled "Access to and Occupancy of Highways by Driveways and Local Roads"