

# **CIVIL COMPLAINT REGARDING THE WRONGFUL DEATHS OF 12 PERSONS<sup>1</sup>**

from William B. Trescott  
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Reputable organizations have alleged that an illegal meeting occurred between an Administrator the Federal Motor Carrier Safety Administration (FMCSA) and trucking industry officials on or about July 14<sup>th</sup>, 2005.<sup>2</sup> Evidence will prove that persons attending this meeting caused the deaths of the following persons in Texas identified by consecutive case number in the National Highway Traffic Safety Administration's Fatality Analysis Reporting System:

#07-48-2396—The driver of a Freightliner, VIN #1FUYSZYB2YL787477, struck another Freightliner, 1FUBA5CG15LN47918, head on in clear weather, killing both drivers despite both wearing seat belts on October 16<sup>th</sup>, 2007 on I-10;

#07-48-565—The driver of a Freightliner, 1FUJA3CG51LF53928, was killed when he struck the rear of another tractor trailer and two cars March 14<sup>th</sup>, 2007 on I-20;

#06-48-3022—The driver of a Navistar, 2HSCHAPR73C070471, crossed the median in clear weather, struck a vehicle, ran into a ditch, rolled over and was killed December 23<sup>rd</sup>, 2006 on US-62;

#06-48-2932—The driver of a Freightliner, 1FUJBBCG33LK45535, struck two vehicles, became airborne, rolled over, and was killed December 26<sup>th</sup>, 2006 on US-281;

#06-48-2904—The driver of a Freightliner, 1FUYSSEB2XPA48731, was struck by part of another vehicle and killed despite wearing seat belts December 17<sup>th</sup>, 2006 on SR-315;

#06-48-2473—The driver of a Freightliner, 1FUJA6CK94LM91814, crossed a traffic barrier and struck a Kenworth, 1XKTDB9X24J394554, head on in clear weather and both drivers were killed on November 3<sup>rd</sup>, 2006 on I-35;

#06-48-1913—The driver of a Freightliner, 1FUJA6CK97LX41363, hit two vehicles, jackknifed, and was killed despite wearing seat belts August 25<sup>th</sup>, 2006 on I-20;

#06-48-1169—The driver of a Kenworth, 1XKWDB9X6WR764342, crossed the center line in clear weather, hit another vehicle, and was killed June 5<sup>th</sup>, 2006 on I-45;

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<sup>1</sup> An electronic version can be downloaded from [www.truckingvideo.com/litigation/complaint.pdf](http://www.truckingvideo.com/litigation/complaint.pdf).

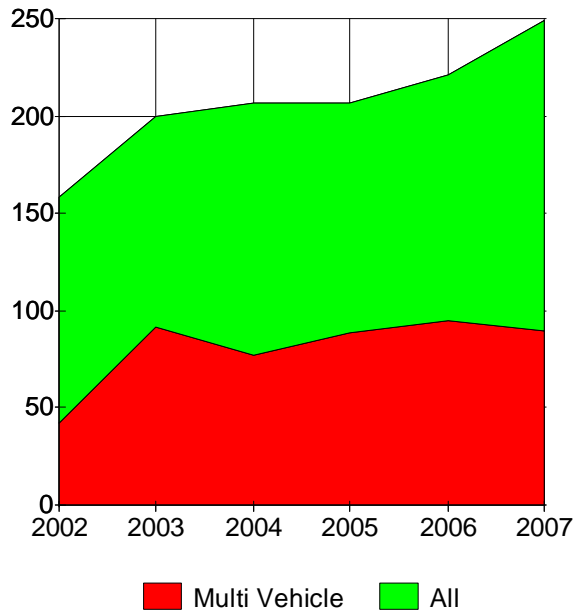
<sup>2</sup> <http://www.citizen.org/documents/ACFD96.pdf> (see attachment)

#06-48-624—The driver of a Freightliner, 1FUJAPCG91LH74732, crossed the median in the rain, hit three vehicles, jackknifed, and was killed March 29<sup>th</sup>, 2006 on SR-276;

#06-48-516—The driver of a Freightliner, 1FUJA6CK76LU66400, wearing seat belts, jackknifed and struck a Navistar, 2HSFMAHR5VC025992, while negotiating a curve in the rain and both drivers were killed March 18<sup>th</sup>, 2006 on I-20.

The above fatalities are wrongful deaths because, following the alleged meeting, **the Federal Motor Carrier Safety Administration defied a court order<sup>3</sup> vacating changes to truckers' hours of service regulations<sup>4</sup> that caused most of the above crashes.** According to the Fatality Analysis Reporting System, after changes to hours of service limits were imposed in 2003, **the number of tractor trailer drivers killed in daytime<sup>5</sup> crashes with other vehicles doubled** (see attachment). The rule changes allowed industry officials to overwork their employees **beyond human endurance**, requiring up to 11 hours of driving within a 14 hour period—up to 82 hours per week—leaving little time for loading, unloading, and rest breaks in violation of a California law.<sup>6</sup> Under the old rules in effect since 1935, truckers could not be ordered to drive more than 10 hours a day or 69 hours per week.

**Daytime Tractor Trailer Fatalities**



The illegal meeting also affected litigation to decriminalize modern safety devices on heavy trucks: In *Trescott v. Secretary of Transportation*,<sup>7</sup> a Motion was filed for Extension of Time claiming “agency input” would not be available until July 15<sup>th</sup>, 2005—the day after the alleged meeting—which was granted by the court. When the agency re-promulgated the same rules thrown out by the court, the DC Court of Appeals issued a second order vacating the changes<sup>8</sup> which was also ignored.

Although only one former Chairman of the Senate Commerce Committee who improperly delegated authority to these officials in violation of statute<sup>9</sup> has thus far been convicted of receiving gifts,<sup>10</sup> the benefits of

<sup>3</sup> *Public Citizen v. FMCSA*, 374 F.3d 1209 *et seq.* (D.C. Cir. 2004)

<sup>4</sup> 49 CFR Parts 385 and 395

<sup>5</sup> between the hours of 9AM and 8PM

<sup>6</sup> Section 512(a) & 11090(12) of the California Labor Code requires meal and rest breaks

<sup>7</sup> United States District Court for the District of Columbia No. 05-678

<sup>8</sup> *OUIDA v. FMCSA*, DC Court of Appeals, No. 06-1035, July 2007

<sup>9</sup> 49 U.S.C. § 113(c)—“shall be an individual with professional experience in motor carrier safety.”

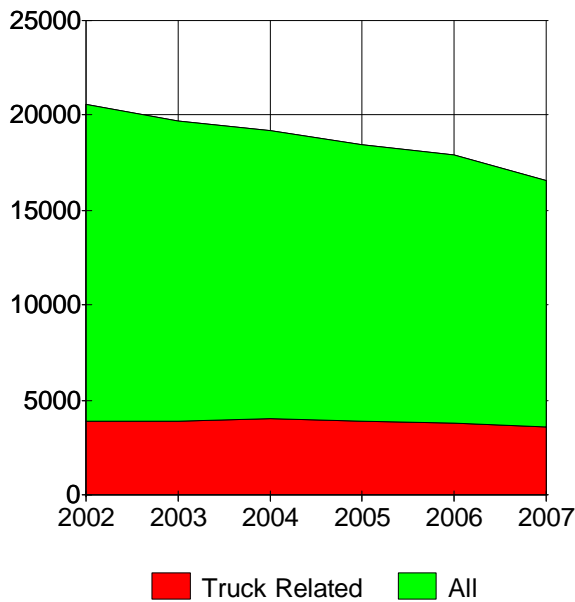
<sup>10</sup> Former Co-chairman of the Senate Committee on Commerce, Science and Transportation (109<sup>th</sup> Congress) Senator Ted Stevens of Alaska was convicted in United States District Court for the District of Columbia (No. 08-0231: *USA v. STEVENS*) of seven felony counts of failing to report gifts from an oil company on 10/27/08

their changes in hours of service rules to trucking companies and the oil companies that supply them have been considerable: the nation's largest truckload carrier, J.B. Hunt,<sup>11</sup> announced record earnings of \$60.3 million; Landstar<sup>12</sup> reported record third quarter revenue of \$733 million; Conway,<sup>13</sup> Celadon,<sup>14</sup> Marten,<sup>15</sup> Knight,<sup>16</sup> Werner,<sup>17</sup> Old Dominion,<sup>18</sup> Heartland,<sup>19</sup> Covenant,<sup>20</sup> and UTS<sup>21</sup> all reported revenue increases of 10 to 24 percent in the 3<sup>rd</sup> quarter of 2008; Exxon, the nation's largest oil company, announced record earnings of 14 billion.<sup>22</sup> While a theory of sovereign immunity may protect FMCSA officials from prosecution, that would not be true of the industry officials who allegedly conspired<sup>23</sup> with them to defy the court orders. Because daytime collisions doubled and local trucks or nighttime crashes are not listed, the majority of the above workplace fatalities must be considered other than accidental. If any industry official present at

the meeting represented the employer of any of the above employees who was later killed on the job, bingo!

Even if a grand jury decides that some of the above crashes were accidental, reasonable persons will recognize that most of these fatalities could still have been prevented by legalizing modern safety devices: The National Highway Traffic Safety Administration's Traffic Safety Overview<sup>24</sup> revealed that fatalities of passenger car occupants, a group benefiting from modern safety devices not required to comply with hours of service regulations, dropped 20% from 20,569 in 2002 to 16,520 in 2007 (p.2) while fatalities of large truck occupants, a group prohibited from equipping their vehicles with modern safety devices<sup>25</sup> and who are required to comply with hours of

### Passenger Car Fatalities



<sup>11</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61646](http://www.truckinginfo.com/news/news-detail.asp?news_id=61646)

<sup>12</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61672](http://www.truckinginfo.com/news/news-detail.asp?news_id=61672)

<sup>13</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61739](http://www.truckinginfo.com/news/news-detail.asp?news_id=61739)

<sup>14</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61735](http://www.truckinginfo.com/news/news-detail.asp?news_id=61735)

<sup>15</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61717](http://www.truckinginfo.com/news/news-detail.asp?news_id=61717)

<sup>16</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61740](http://www.truckinginfo.com/news/news-detail.asp?news_id=61740)

<sup>17</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61674](http://www.truckinginfo.com/news/news-detail.asp?news_id=61674)

<sup>18</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61738](http://www.truckinginfo.com/news/news-detail.asp?news_id=61738)

<sup>19</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61708](http://www.truckinginfo.com/news/news-detail.asp?news_id=61708)

<sup>20</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61766](http://www.truckinginfo.com/news/news-detail.asp?news_id=61766)

<sup>21</sup> [http://www.truckinginfo.com/news/news-detail.asp?news\\_id=61794](http://www.truckinginfo.com/news/news-detail.asp?news_id=61794)

<sup>22</sup> <http://www.businesswire.com/portal/site/exxonmobil/index.jsp?>

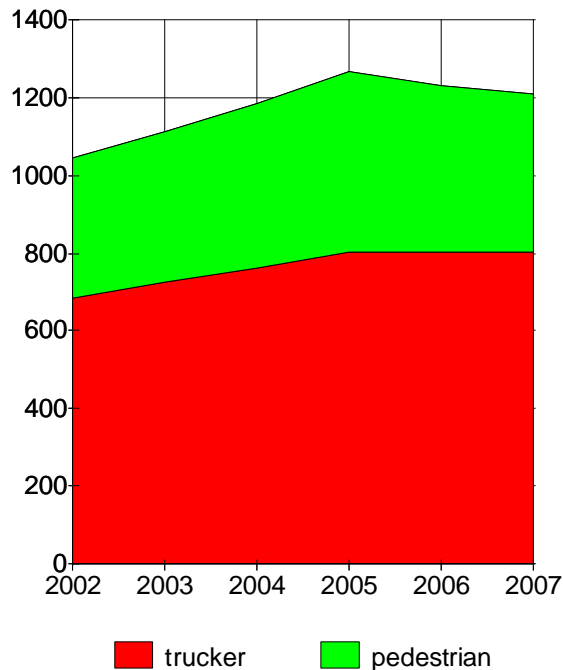
[ndmViewId=news\\_view&ndmConfigId=1001106&newsId=20081030005627&newsLang=en](http://www.businesswire.com/portal/site/exxonmobil/index.jsp?ndmViewId=news_view&ndmConfigId=1001106&newsId=20081030005627&newsLang=en)

<sup>23</sup> The New York Times alleged that from 2000 to 2006, the trucking industry directed more than \$14 million in campaign contributions to Republicans and its donations and lobbying fees were about \$37 million from 2000 to 2005. (Stephen Labaton, Dec. 3, 2006)

<sup>24</sup> [http://www.nhtsa.dot.gov/portal/nhtsa\\_static\\_file\\_downloader.jsp?file=/staticfiles/DOT/NHTSA/NCSA/Content/TSF/2007/810993.pdf](http://www.nhtsa.dot.gov/portal/nhtsa_static_file_downloader.jsp?file=/staticfiles/DOT/NHTSA/NCSA/Content/TSF/2007/810993.pdf)

<sup>25</sup> occupant protection is illegal in trucks because of weight laws—23 CFR § 658.17(b), TRC § 621.101(b)&(c)

## Heavy Truck Fatalities



the time of the alleged meeting, stated in in his Response<sup>27</sup> to my Petition to Reconsider<sup>28</sup> that “National Highway Traffic Safety Administration (NHTSA) data show that the total number of persons killed in crashes involving a large truck dropped from 4,939 in 2002 to 4,808 in 2007,” and that my charges that “changes in hours of service rules...compel drivers to drive more during daytime hours when collisions with cars are more likely—killing and additional 600 people per year’...are completely unfounded” because “no subset of this declining total...grew by 600.” However, motor carrier safety is an applied science that relies on controlled studies in which statistical data is always compared with that of a control group to compensate for the influence of external factors such as economic conditions, improvements in trauma care, drunk driving enforcement, seat belt laws, air bags, and lower speeds resulting from traffic congestion. No one disputes that modern safety devices on cars reduced the number of fatalities. The question before the Court was whether industry officials should have been allowed to overwork their employees just because cars got safer. The Court said no. The Administrator is required by statute<sup>29</sup> to possess “professional experience” performing such calculations.

President Bush promoted the outgoing Administrator, an alumnus of a small evangelical Christian college called Taylor University, two weeks after a truck crash killing four Taylor University students in almost identical circumstances to the crashes listed above was featured on television.<sup>30</sup> The truck driver, who was hospitalized due to his injuries, was made to serve more

service regulations, increased 16% from 689 in 2002 to 802 in 2007. The miles driven by large trucks rose only 4% during this period<sup>26</sup>—less than the 5% increase in miles traveled by passenger vehicles—so the 36% difference in fatal outcomes after changes to hours of service limits were imposed cannot be explained by changes in miles driven.

Because the number of truckers killed on the job increased 16% and the number of motorists killed in collisions with trucks fell by only 7% during this period—13% less than overall passenger car fatalities—the reasonable person must conclude that at least 13% of the 4,808 heavy truck fatalities recorded in 2007, approximately 625 of them, are attributable to changes in hours of service regulations. Evidence of this is that **the number of pedestrians and bicyclists killed by trucks increased 12.5%.**

In his defense, the outgoing Administrator, who was Chief Safety Officer of the FMCSA at

<sup>26</sup> [http://www.nhtsa.dot.gov/portal/nhtsa\\_static\\_file\\_downloader.jsp?file=/staticfiles/DOT/NHTSA/NCSA/Content/TSF/2007/810989.pdf](http://www.nhtsa.dot.gov/portal/nhtsa_static_file_downloader.jsp?file=/staticfiles/DOT/NHTSA/NCSA/Content/TSF/2007/810989.pdf)

<sup>27</sup> <http://www.regulations.gov/fdmspublic/ContentViewer?objectId=0900006480830710&disposition=attachment&contentType=pdf>

<sup>28</sup> <http://www.regulations.gov/fdmspublic/ContentViewer?objectId=09000064807cb530&disposition=attachment&contentType=pdf>

<sup>29</sup> 49 U.S.C. § 113(c)—“shall be an individual with professional experience in motor carrier safety.”

<sup>30</sup> A Freightliner crossed the median and struck a passenger van 8:09PM, April 26<sup>th</sup> 2006 as recently seen in a two

than a year in prison because he was overworked and fell asleep at the wheel. His employer and the Administrator who permitted this were never prosecuted. Is that fair?

Neither the outgoing Administrator or the one who allegedly attended the illegal meeting had accumulated the hundreds of thousands of crash free miles and numerous safety awards driving commercial vehicles normally needed to qualify for employment as a motor carrier safety professional. Both Administrators who violated the 2004 and 2007 court orders were former police officials.<sup>31</sup> More alarmingly, President Bush appointed his Assistant and Staff Secretary to sit on the DC Court of Appeals two weeks after the outgoing administrator was appointed despite an apparent lack of prior experience as a judge.<sup>32</sup> This judge then delayed my case to decriminalize modern safety devices by transferring it back to district court, overruling the lower court's decision that the Court of Appeals has exclusive jurisdiction<sup>33</sup>—despite the fact that Congress held a motor carrier safety hearing on the day the agency response was due<sup>34</sup> and the National Highway Traffic Safety Administration settled its part of the suit two days before the *Respondents'* brief was due<sup>35</sup>—which they believe will save the lives of 476 Americans per year. In sworn testimony before Congress, the outgoing Administrator made a misleading statement that “2005 enjoyed one of the lowest large-truck fatality rates in 30 years”<sup>36</sup> when in fact, trucker fatalities rose 17% in just three years and reached a 16 year high in 2005. The number of pedestrians and bicyclists killed by trucks increased 29% between 2002 and 2005 while the number of truckers killed in daytime collisions with other vehicles doubled!<sup>37</sup> One in every seven Americans killed on the job in 2007 was a truck driver.<sup>38</sup>

To protect themselves, the number of truckers wearing seat belts jumped dramatically to a record level of 65 percent in 2007—up from only 48 percent in 2003.<sup>39</sup> The outgoing Secretary of Transportation proclaimed, “we won't rest until 100 percent of commercial motor vehicle drivers wear a seat belt.” Could a 35% increase in seat belt use “*cause*” a 16% increase in trucker fatalities? A Ford Motor Company engineer once said of vehicles lacking modern safety features: “**It is obvious that occupants that are restrained in upright positions are more susceptible to injury from a collapsed roof than unrestrained occupants who are free to tumble about the interior of the vehicle. It seems unjust to penalize people wearing effective restraint systems by exposing them to more severe injuries than they might expect with no restraints.**”<sup>40</sup>

While it can fairly be said that police officers who fairly and honestly enforce the law are heroes, even if in the course of their investigations they sometimes impersonate prostitutes and drug dealers; police officials who impersonate safety professionals to fraudulently obtain the

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hour special on Dateline NBC-TV, 12/26/08. The story attracted media attention because one student was buried in the wrong grave while another was cared for by the dead girl's parents.

<sup>31</sup> Chief of Washington State Patrol & Commander of Commercial Vehicle Enforcement, Indiana State Police

<sup>32</sup> May 30<sup>th</sup>, 2006, <http://www.cadc.uscourts.gov/internet/home.nsf/Content/VL+++Judge+++BMK>

<sup>33</sup> Docket #07-1327, 49 U.S.C. § 31136(a), 28 U.S.C. § 2342(3)(A)

<sup>34</sup> Subcommittee on Surface Transportation, July 11<sup>th</sup>, 2007

<sup>35</sup> January 30<sup>th</sup>, 2008, Docket # NHTSA-2008-0015, RIN 2127-AG51, 73 FR 5485

<sup>36</sup> July 11<sup>th</sup>, 2007 testimony of FMCSA Administrator John H. Hill

<sup>37</sup> [http://www-fars.nhtsa.dot.gov/finalreport.cfm?title=Trends&stateid=0&year=2005&title2=Large\\_Truck\\_Related](http://www-fars.nhtsa.dot.gov/finalreport.cfm?title=Trends&stateid=0&year=2005&title2=Large_Truck_Related)

<sup>38</sup> <http://www.bls.gov/iif/oshwc/cfoi/cftb0227.pdf>, p.13

<sup>39</sup> <http://www.fmcsa.dot.gov/about/news/news-releases/2008/080325.htm>

<sup>40</sup> *The Hidden Failures of Belts in Rollover Crashes*, [http://www.citizen.org/documents/belt\\_report.pdf](http://www.citizen.org/documents/belt_report.pdf), p. 9

power to make laws as well as enforce them undermine democracy. In any other industry, an imposter impersonating a skilled professional could easily be removed by simply calling the police. Truckers can't do that because the impostors are the police. Nor can truckers get a fair hearing if one of the judges who is supposed to have exclusive jurisdiction may have been responsible for carrying out the President's orders to hire the impostors.

While there is a one in five chance that President Bush's Secretary was randomly assigned to hear my case to decriminalize modern safety features, there is a four out of five chance that the decision to overrule district court was motivated by a desire to delay judgment until after the election because the co-Chairman of the Senate Commerce Committee not convicted of receiving gifts—who owns a type of trucking company called a beer distributorship and benefited from hours of service rules favorable to his family business—became the Republican presidential candidate. His additional profit gleaned from reduced labor costs was likely many times the value of the gifts received by the Senator who was convicted.

By trend line analysis, assuming 625 additional deaths per year, of the 25,241 Americans killed by trucks from 2003 to 2007, approximately 2,600 lost their lives as a result of changes to hours of service rules. A sober motorist is now twice as likely to be killed by a heavy truck as by a drunk driver. When 2008 and 2009 data is tabulated, the carnage will surpass the 9/11 terrorist attacks. Of the more than a thousand additional truckers killed nationwide, the above twelve are statistically predicted to have lost their lives in Texas as a direct result of changes to hours of service regulations. Therefore, upon examination of the evidence on a case by case basis, a grand jury will have no choice but to conclude that **the majority of the on the job fatalities listed above would have been prevented by complying with the 2004 court order or by decriminalizing modern safety devices.** I request that the State of Texas and the Department of Justice convene a grand jury to investigate these deaths.

Respectfully Submitted



William B. Trescott

Author of:

*So You Want to Drive a Truck?*  
*Sargent Texas Reckless Driving Video*  
*How to Succeed as an Owner-Operator*  
*The Secretary of Transportation's Message to Truckers*  
*Creation of a Minority Group—The New Danger in America's Trucks*  
*Congressman Ron Paul's 'The Safer Truck Act'*  
(HR 1248, 108th Congress; HR 2083, 107th Congress)  
*www.truckingvideo.com*  
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July 18, 2005

Mr. Ken Mead  
Inspector General  
Office of the Inspector General  
Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Inspector General Mead:

It has come to our attention that a meeting allegedly took place between the Administrator of the Federal Motor Carrier Safety Administration (FMCSA), Ms. Annette Sandberg, and representatives of the trucking industry to jointly plan a lobbying strategy to alter the pending highway legislation, H.R. 3, that is before a joint House-Senate conference committee. At the meeting, which occurred on or about July 14, 2005, we understand that a lobbying strategy was developed to advance legislative amendments pertaining to the hours of service (HOS) regulations. In particular, the meeting may have included discussion of a plan to promote amendments sought by the Department of Transportation (DOT), one to codify the current HOS even though rulemaking is pending, another to undercut federal law that now requires health protection for truck drivers, along with a separate proposal to amend the HOS rules by counting daily break time as off-duty time (i.e., "off the clock") rather than as on-duty time ("on the clock"). The latter proposal would, in effect, extend the length of the driver's workday to 16 hours and was withdrawn on the House floor because of major opposition. We are concerned that participation in this meeting, and in the discussion regarding HOS legislative strategy, if it indeed occurred, may well constitute a violation of statutory lobbying restrictions and the ethical conduct required of federal officials.

First, federal law prohibits appropriated federal funds from being used, **directly or indirectly**, to pay for actions "**intended or designed to influence in any manner a Member of Congress . . . to favor or oppose by vote or otherwise, any legislation or appropriation by Congress. . .**" Consolidated Appropriations Resolution, 2003, Sec. 322, Pub. L. 108-7 (Feb. 20, 2003), identical language has appeared in previous DOT appropriations bills. A meeting with a major industry lobbying group involving federal agency personnel to jointly plan strategy or discuss actions involving efforts to secure Congressional approval of legislation, or amendments to legislation, may constitute a violation of federal law. **Any expense** of federal agency funds, whether used directly or indirectly, to advance an effort to influence Congress to favor these amendments violates the letter, meaning, and intent of the law. Thus, the cost of the Administrator's time to attend the meeting, or the presence of agency staff at the meeting, the use of an agency telephone to set up the meeting or convey the results, or the use of agency stationary in furtherance of the intent or design to influence Congress would qualify as an expense and violate the law.

Second, merely holding such a meeting to discuss matters that are the subject of a pending agency rulemaking constitutes a prohibited *ex parte* meeting. In this instance, rulemaking on the HOS regulation is pending, U.S. DOT docket No. FMCSA-2004-19608, and the public comment period closed on March 10, 2004. Moreover, the intent of such a meeting appears to have been to develop a legislative plan that would substantively affect the provisions in the pending rule and thwart the rulemaking process. Participation in a private meeting to discuss ways and means to obviate pending agency rulemaking or to alter or change the substance of the rule behind closed doors could implicate agency personnel in official misconduct. Private meetings between agency officials with stakeholders regarding substantive issues of pending rules at the very least abridge the public's due process rights and violates both the Administrative Procedures Act (APA) and DOT regulations prohibiting *ex parte* meetings while rulemaking is pending.

Finally, participation in a meeting to secretly discuss pending business before the agency presents serious implications regarding the role of agency management in relation to the industry over which they have regulatory authority and their responsibility for public safety. These actions may also constitute an ethical violation of the guidelines published by the federal Office of Government Ethics.

Because such a meeting would have a significant impact on the integrity of a federal agency and the conduct of official government business, we request that you open a formal investigation in order to determine the facts and whether any laws, regulations, and ethical standards may have been violated.

Joan Claybrook  
President  
Public Citizen

Daphne Izer  
Founder  
Parents Against Tired Truckers

John Lannon  
Executive Director  
Citizens for Reliable and Safe Highways

Andrew McGuire  
Executive Director  
Trauma Foundation



Query - Step 4: Choose Report Format Options

Submit

Clear Form

Univariate Tabulation creates a tally report that lets you view the number of occurrences for each value of a variable. Select the variable to use, data to count, whether or not to display zero values on the Univariate report, then click Submit.

Total Count(s)	
Fatal Crashes:	80
Vehicles:	84
Persons:	85
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Select Grouping Option:	None
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Report Title:	<input type="text"/>



Search Criteria:

Year **2007**

[Crash Hour](#) (9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19)

[Number Of Vehicle Forms Submitted](#) (2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19)

[Injury Severity](#) (4)

[Vehicle Configuration](#) (6) **tractor/ one trailer**

Fatal Crashes:	41
Vehicles:	41
Persons:	42
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Select Data to Count:	Number of Crashes
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Show ZERO Values:	<input type="radio"/> Yes <input checked="" type="radio"/> No
Report Title:	<input type="text"/>



Search Criteria:

Year **2002**

[Crash Hour](#) (9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19)

[Number Of Vehicle Forms Submitted](#) (2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19)

[Injury Severity](#) (4)

[Vehicle Configuration](#) (6) **tractor/ one trailer**