

**ADDITIONAL JUSTIFICATION FOR CHANGES TO  
MFTURP-1, SECTION B.I, ITEM 5**

- Ammunition and Explosives (AE) must follow strict timelines for public exposure. The cardinal rule for explosives states: Expose the minimum number of people, for the minimum time, to the minimum amount of explosives, *Defense Explosives Safety Regulation, DESR 6055.09*.
- SNS shipments are sensitive items that require specific safety and security measures. These type items should not be allowed to linger in the public domain for periods longer than required to complete delivery, thereby increasing safety and security risks.
- Table 202-2: This table is derived from TDD Standards which are for standard commodities. These times are not conducive with safety and security requirements for sensitive and classified material. These times need to be reduced to decrease exposure and risk. Also see Department of Defense's Ground Transportation and Secure Hold of Arms, Ammunition, and Explosives in the United States (DODIG-2020-071) (D2019RK-0114), 23 March 2020.
- Extra driver (EXD) accessorial is not compatible with SNS (DDP and PSS) protective service shipments. Dual Driver is required for these shipments.
- Based on data reviewed from SDDC G3 DTTS, sensitive items and explosives have been allowed to linger on public highways based on old requirements in the tables. There is no standard identified by DOT or DoD for movement of these item with the exception of safety and security requirements in DoD regulatory guidance. DOT guidance only governs Hours of Service in 49 CFR Part 395. These requirements would allow a dual driver team to travel approximately 1500 miles in a 24 hour period. DoD will allow up to 2 hour stops that will allow for fuel, food, shower, etc. 2 hour stops are not limited. Day of pick-up does not count however, weekends and holidays will count and must be coordinated between shipper and receiver for arrivals.

700 miles in a 24 hour period allows a lot of cushion. (breaks, traffic, weather, stop-offs, etc)							
Drivers are allowed to drive up to 11 hours in a 14 hour on-duty period. A 30 minute break is required during an 8 hour driving period.							
In a 14 hour on-duty period for a driver who can drive for 11 hours: Travels at 45 MPH, 30 minute rest break, 30 minute pre-trip and post-trip, one driver could travel up to approximately 495 miles maximum. 2 drivers in a 24 hour period could potentially travel approximately 990 miles maximum.							
	Example 1				Example 2		
Driver 1				Driver 1			
Start 0000	Pre-trip	0.5		Start 0000	Pre-trip	0.5	
	Drive	7.5			Drive	7.5	
	Break	0.5 Required			Break	0.5 Required	
	Drive	1			Drive	3.5	
	Break	2 SDDC		Stop 1230	Post-trip	0.5	
	Drive	2			12.5 hours on-duty		
Stop 1400	Post-trip	0.5			11 hours driving @ 45 MPH = 495 miles		
	14 hours on-duty				Driver is required to take 10 hours off-duty/sleeper berth before on-duty again		
	10.5 hours driving @ 45 MPH = 472.5 miles						
	Driver is required to take 10 hours off-duty/sleeper berth before on-duty again			Driver 2			
				Start 1230	Break	2 SDDC	
Driver 2					Pre-trip	0.5	
Start 1400	Pre-trip	0.5			Drive	4	
	Drive	4			Break	1.5 SDDC	
	Break	2 SDDC		2400	Drive	3.5	
2400	Drive	3.5			11.5 hours on-duty		
	10 hours on-duty				7.5 hours driving @ 45 MPH = 337.5 miles		
	7.5 hours driving @ 45 MPH = 337.5 miles						
	Total distance in 24 hours = 810 miles				Total distance in 24 hours = 832.5 miles		

