



NATIONAL PRIVATE TRUCK COUNCIL  
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QA 17587

FHWA-97-2176

March 16, 1993

FHWA Docket No. MC-92-10  
Room 4232, HCC-10  
Office of Chief Counsel  
Federal Highway Administration  
400 Seventh Street, SW  
Washington, DC 20590

RE: DOCKET NO. MC-92-10, MANDATORY MINIMUM TRAINING REQUIREMENTS  
FOR OPERATORS OF LONGER COMBINATION VEHICLES (LCVS)

Enclosed is an original and one (1) copy of the comments of the National Private Truck Council in the above-referenced docket.

Please date-stamp the copy and return in the self-addressed stamped envelope that is enclosed.

Respectfully,

Doreen E. Reagan  
Director of Safety Programs

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**NPTC 1993 Annual Education/Management Conference  
May 2-5, 1993, San Diego, CA**



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RE: DOCKET NO. MC-92-10, MANDATORY MINIMUM TRAINING REOUIREMENTS FOR OPERATORS OF LONGER COMBINATION VEHICLES (LCVS)

The National Private Truck Council (NPTC) is the national association of manufacturers, processors, distributors, and retail establishments that operate commercial motor vehicle fleets incidental to and in furtherance of their primary, nontransportation business enterprises. **NPTC's** membership comprises close to **1200** national and regional corporations, and includes many of the Fortune 500 companies. Collectively, the private fleet community hauls more than half of the nation's freight, and operates almost two-thirds of the nation's trucks.

NPTC is a strong supporter of DOT safety initiatives that protect public safety and ensure commercial drivers and vehicles are safe. NPTC supports a high standard for operators of longer combination vehicles but also points out that LCV operations boast the safest driving record of all tractor-trailer units.

According to **NPTC's** 1992 Private Fleet Profile, fourteen percent (14%) of **NPTC's** private fleet members indicated that they operate longer combination vehicles (LCVs) so they are an important part of our organization.

NPTC Recommendations

NPTC Supports Performance-Based Approach Using CDL Road Test  
 NPTC supports a performance-based approach to demonstration of LCV driver skills and abilities and requests that FHWA consider tying the LCV training requirement to the current CDL endorsement program. (NPTC uses the term LCV to mean those LCV vehicles as defined in the ISTEA).

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The current CDL endorsement program for LCV operators does not require a road test. An LCV driver should be expected to demonstrate the safe operation of each type of LCV vehicle he or she will be driving by passing a road test. The passing of the road test would become the means for verifying that adequate training has taken place. Grandfather provisions could be considered for drivers currently operating **LCVs**.

NPTC believes using the road test as part of the CDL endorsement is a cost-effective and efficient way to verify training of LCV drivers. The basis for testing the safety and proficiency of LCV operators is already in place with the CDL program.

Retraining could be addressed at the time of renewal of a driver's CDL. For example, a driver might be required to retake the written and road test if his or her license has been suspended or revoked during the time that has elapsed since the last license renewal.

#### Benefits of a CDL Endorsement Program

There are additional benefits to tying LCV training to the CDL endorsement program. A program developed by the federal government and administered by the states will have greater uniformity. It allows the information to be captured in a national database which would ensure accessibility and make the program easier to police.

#### NPTC Supports Federal Guidelines, Not Requirements

NPTC supports federal guidelines for the training of LCV operators but believes the type and amount of training should be left up to industry so that the employer and driver can choose the most **cost-effective** and practical method.

Cost is one of the most important aspects to be considered in **FHWA's** proposal for mandatory minimum training requirements for LCV operators, the most critical question being who will pay for the training if FHWA mandates specific and comprehensive training requirements.

NPTC members involved in LCV operations already hold their LCV drivers to strict training standards. The safety record of LCV drivers is further proof that industry is meeting its responsibility of assuring safe LCV drivers. NPTC members involved in LCV operations work hard to ensure that their LCV drivers are trained, are safe and are proficient in the necessary driving skills.

NPTC members do not favor third party certification. It would add a financial burden to their already expensive safety program. With respect to certification, many of **NPTC's** members are self-insured

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and already have a set of procedures they must meet to ensure proper training of their drivers.

The **ISTEA** provisions seek certification of the instructors of LCV training. NPTC members prefer self-certification over third-party certification. FHWA could monitor and verify self-certification through the normal channels of its safety audit programs. This would be consistent with other FHWA programs.

#### Shared-Cost Concept

Tying **LCV training** to the CDL promotes a shared-cost approach. The states, the motor carrier employer and the drivers would all share in the costs of ensuring LCV operations are safe.

If the states become the body that tests and the skills of LCV drivers, there will be costs to train the testing personnel. Some of the cost may be passed through to the driver who must pay for the CDL and the endorsement. The training cost remains in the hands of motor carriers and the drivers to address in the most practical and cost-effective way.

#### Specific Responses to FHWA Questions

NPTC offers the following comments to specific questions posed by FHWA in the proposed rulemaking where it feels it can be most helpful.

(1) Which vehicles should be covered by the training requirements? **LCVs** as defined in **ISTEA** or should the definition be expanded to cover other multi-trailer combinations that may have a lower weight threshold than the 80,000 pounds used in **ISTEA**.

NPTC supports driver training guidelines for LCV vehicles as defined in the **ISTEA**. This is what Congress has mandated and NPTC sees no reason to try to encompass more vehicles. We should start with the **ISTEA** defined vehicles and then if necessary build on that program later. NPTC is not aware of any information that indicate a safety problem with combinations vehicles below 80,000 pounds that might warrant special training.

(2) How would enforcement distinguish between those vehicles that require specialized training and those that do not?

No comment at this time.

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(3) What should **FHWA's** role be in assuring the training is carried out?

FHWA should seek to enhance the CDL test by including skills testing for LCV operators.

(4) What standards are necessary to ensure that instructors have been adequately trained and properly trained and are carrying out their training responsibilities in an acceptable manner?

NPTC favors self-certification. The safety record of LCV operations indicates that companies take their responsibilities seriously and already effectively employ measures to ensure proper instruction and training of LCV drivers. FHWA might want to develop guidelines for instructor certification but allow companies to self-certify. This would be consistent with and would be part of a performance-based approach to LCV training.

(5) Who should be responsible for licensing and certifying LCV drivers, states or FHWA? How should this be accomplished?

NPTC supports a state administered CDL endorsement program for LCV drivers as the vehicle for verifying adequate LCV knowledge, skills and training. FHWA might consider specifying areas of skill training that instructors and drivers ought to focus on, as it does for the knowledge portion of the **CDL's** LCV endorsement.

(6) Which agency should be responsible for assuring the requirements are met? What form of documentation should be established a proof to prospective employers? Who is accountable if the training is not met, motor carrier or driver?

Assurance that the requirements are being met should become part of the CDL program.

Simple written verification of an instructor's training should be adequate for prospective employers.

The driver is responsible for securing a valid CDL. The motor carrier is responsible for making sure any driver put out on the road has a valid CDL, including necessary endorsements, and is medically fit. In the case of an owner-operator, he or she is also the employer.

7) Should nonprofit, private organizations be authorized to evaluate and certify the adequacy of LCV training programs?

Any third-party programs should be voluntary, at the discretion of the motor carrier.

(8) What types of LCV driver training programs exist?

NPTC members use in-house programs or the programs offered by leasing companies.

(9) Should the implementation of minimum training requirements for LCV operators be "phased **in**" over a certain period of time?

If FHWA adopts the CDL endorsement approach there would be no need for a "**phased in**" period. All drivers would be able to obtain the endorsement without major problems. If a grandfather provisions were adopted current drivers would not have to take the road test.

(10) Should LCV training be a prerequisite for a double/triple trailer endorsement on a CDL?

Yes. This is the concept that NPTC supports; using the CDL endorsement program as the means of ensuring adequate training.

(11) Should all LCV drivers be required to have previous experience with single trailer vehicles? How much?

No comment at this time.

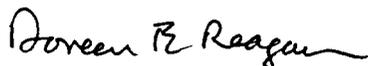
(12) How often should LCV training be offered/repeated for both instructor and driver?

It should be left up to the employer to train as needed. the driver's passing of the CDL endorsement test for **LCVs** should be adequate proof of training.

(13) Do specialized vehicle combinations such as triple or those handling special cargo require different training standards?

No comment at this time.

Respectfully submitted,



Doreen E. Reagan  
Director of Safety Programs  
National Private Truck Council