

QA 17594

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

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RE: Establishment of Mandatory Minimum Training
Requirements for the Operators of Longer
Combination Vehicles

FROM: The American Automobile Association
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The American Automobile Association appreciates this opportunity to provide the Federal Highway Administration with our views concerning the establishment of mandatory minimum training requirements for the operators of longer combination vehicles (LCVs). The lack of specific mandatory training requirements to obtain a commercial driver's license is a dangerous void that needs to be immediately filled. AAA commends FHWA for soliciting comments on this important issue.

Each of the various truck vehicle types has different operating characteristics. Because each makes different and increasing demands on the driver, AAA has long advocated that potential CDL applicants be tested in the highest class of vehicle that they wished to be licensed for.

No driver should be put behind the wheel of a double or triple trailer combination without adequate training - especially after FHWA advised the trucking industry against the practice some years ago.

LCV maneuverability and stability differ markedly from that of single trailer combinations.

A 1984 study undertaken by the California Department of Transportation tested LCV use over a 1,200 mile route. The study disclosed several disturbing findings about LCVs. Triples had a

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continual sideways sway of four to six inches while traveling over open road segments. The swaying at times increased to well over one foot and had a noticeable effect on adjacent traffic.

Turnpike doubles were the least maneuverable of the combinations tested. They had problems with interchanges, intersections and off-tracking tests. They even had problems maneuvering through the latest design interchanges in rural areas.

The Model Driver's Manual for Commercial Vehicle Driver

Licensing, developed by the Essex Corporation, further underscores the potential safety problems associated with the operation of LCVs. The manual warns that trucks with trailers have a dangerous "crack-the-whip" effect and that quick lane changes emphasizes the effect with resulting trailer overturns.

The manual also details the degree of risk for trailer rollover because of rearward amplification. Triples have a rearward amplification factor of 3.5, the highest of the eight vehicle combinations rated. This means the last trailer of a triples combination can be rolled over 3.5 times as easily as a five-axle tractor semitrailer with a 45 ft. semitrailer.

It's no wonder motorists feel intimidated by the increasing numbers of large trucks in the traffic stream. Imagine how they would feel if they learned that drivers of LCVs may not have had

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training in the operation and handling of those bigger and heavier rigs!

In the interest of improved highway safety, AAA urges that longer combination vehicle training be made a prerequisite for a double and triple trailer endorsement on a commercial driver's license.

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