



National Transportation Safety Board

Washington, D.C. 20594

March 17, 1993

Office of the Chairman

QA 17605

FHWA-97-2176-17

FHWA Docket No. MC-92-10, room 4232, HCC-10
Office of Chief Counsel
Federal Highway Administration
400 Seventh Street S.W.
Washington, D.C. 20590

Dear Sir:

The National Transportation Safety Board has reviewed the advance notice of proposed rulemaking (ANPRM) "Mandatory Minimum Training Requirements for Operators of Longer Combination Vehicles (LCVs)." The Safety Board is pleased that the Federal Highway Administration has set in motion the mechanism to begin implementing the remaining part of the Safety Board's Safety Recommendation H-86-9¹ to the Secretary of Transportation. The recommendation asked that the Federal Motor Carrier Safety Regulations for driver qualifications, Part 391, "also include formal training as a prerequisite for licensure."

The Safety Board believes that qualifications for drivers of all heavy commercial motor vehicles (CMVs) should include mandatory formal training. This ANPRM is a logical beginning. For the purposes of this rulemaking, the definition of LCVs used in the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) should be expanded only, at this time, to include vehicles operating under a special permit at gross weights over 80,000 pounds and straight trucks pulling single or multiple trailers with overall lengths in excess of 72 feet.

The Safety Board believes that enforcing this rulemaking should not be difficult if the ISTEA definition of LCV is used, because the States have in place a method of monitoring gross vehicle weights.

The administration of the program needed to implement this rulemaking should be carefully thought out. The administration should be set up for future expansion to include the training and testing of all CMV drivers, including the transporting of passengers.

Private nonprofit organizations, such as the Professional Truck Driver Institute of America (PTDIA) should be authorized to evaluate and certify the adequacy of LCV training programs. The Safety Board as part of its advocacy program has had representation on the PTDIA steering committee to develop the training curriculum for multi-unit combination vehicle drivers.

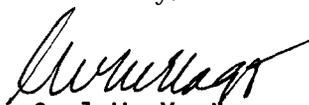
¹Safety Study--Training, Licensing, and Qualification Standards for Drivers of Heavy Trucks (NTSB/SS-86/02).

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The Safety Board believes that all LCV drivers should be required to have previous experience with single-trailer vehicles, because LCV training will require a level of driving performance that can be developed through progressive driving experience with smaller combination CMVs.

The Safety Board supports this rulemaking.

Sincerely,



Carl W. Vogt
Chairman

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