

AMERICAN TRUCKING ASSOCIATIONS



Stephen F. Campbell
Vice President, Safety Department

2200 Mill Road • Alexandria, VA 22314-4677

(703) 838-1847
Fax (703) 683-1934

QA 17638
FHWA-97-2176-25
October 22, 1993

Mr. James E. Scapellato
Director, OMC Standards
U.S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

LEGIS. AGENCS
DIVISION
OCT 20 12:19
FEDERAL BUREAU OF INVESTIGATION

Reference: FHWA Docket No. MC-93-12

Dear Mr. Scapellato:

A number of **ATA** members were present at a recent public meeting conducted by the Professional Truck Driver Institute of America, Inc. (PTDIA) to discuss the outline for a triple trailer driver training curriculum. During the course of that meeting comments were made by a member of your staff regarding the definition of LCV that will be used by FHWA for the purpose of proposed regulations on mandatory minimum training requirements for operators of longer combination vehicles. According to those present, his comments seemed to indicate that FHWA may be strongly leaning towards including all configurations of double trailer combinations as "**LCV's**" for the purpose of minimum training requirements now being considered.

Needless to say, **ATA** is concerned by the possible inclusion of twin trailer combinations of the type now allowed in all states as "**LCV's**" for any purpose including possible mandatory training requirements. As **ATA** pointed out in comments filed on March 16, 1993 on this issue, we believe the definition used should be consistent with FHWA Docket No. 92-15, 23 CFR Parts 657 and 658, "Truck Size and Weight; Restrictions on Longer Combination Vehicles (**LCV's**) and Vehicles with Two or More Cargo Carrying Units." The definition should include the definition of a LCV which operates on the Interstate System, the definition of Trucks over STAA length on the National Network, and a listing of **CMV's** specifically excluded from the definition and the state in which it is excluded.

FHWA should not attempt to include other vehicle types and sizes in the LCV training requirement. We believe that to do so would create unnecessary confusion as to the definition of Longer Combination Vehicles and subject legal twin combination vehicles now allowed in all of the states to needless scrutiny and controversy.

Page 2

ATA is committed to ensuring that LCV's are operated in the safest manner possible by the best and most highly trained and experienced drivers. We urge that FHWA not cloud the issue of LCV safety with the concern of training issues not specifically applicable to any other class of vehicle. Do not lump all twin combination vehicles in the same LCV category.

We respectfully request that this letter be entered into the docket on entry level training for drivers of commercial motor vehicles.

Sincerely,

A. F. Campbell

FHWA DOCKET 92-10-24
PAGE 2 OF 2