

PTDIA ANPRM COMMENTS

It is the belief of the Institute that the training of commercial vehicle drivers of all types should be a voluntary initiative of the private sector. Notwithstanding that, the following comments are provided in response to the questions asked in the ANPRM.

These comments are focused on the **"training"** questions asked in the advanced notice of proposed rulemaking (ANPRM) and are provided in order and by number as expressed in the ANPRM.

Q.3) **"Once** the training requirements for LCV drivers are established, what should the **FHWA's** role be in assuring that the training is actually carried out according to the minimum standards?"

A) The role of FHWA to assure training is actually carried out should be by initiating federal and state agency compliance checks and monitoring. This could be as an extension of the federal function of carrier terminal safety audits and to influence state licensing under CDL requirements to assure drivers meet qualifications, including the proper training, before licenses are issued. Of course at present there is no requirement for training for any driver seeking a CDL license. Persons applying for a first time license need only minimal knowledge and skill preparation to pass the current CDL exams which only sample driver qualifications.

The FHWA role could also include prompting state enforcement effort under the Motor Carrier Safety Assistance Program to include compliance evaluation in work with carriers, and their drivers.

Q.4) **"What** standards are necessary to ensure that instructors, who will be the key to the efficiency and effectiveness of the LCV training, have been adequately and properly trained and are carrying out their training responsibilities in an acceptable manner?"

A) Standards must make certain instructors are qualified by their experience in driving vehicles of the type for which they offer training. In addition, they must have been thoroughly trained in the content, understanding and importance of the subject curriculum. Instructors must also be qualified in methods and techniques of providing vocational training.

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4.5) **"Since** LCV operations are allowed only under special State oversize/overweight permits, should the initial licensing of LCV instructors and certification of LCV drivers be accomplished by a Federal (FHWA or other) or State agency? How should this be accomplished?"

A) Although LCV permits are required to allow the operation of vehicles in the various states, if there is to be regulation, it should be by national regulation and federal control of instructor and driver requirements. To do otherwise would prompt a lack of uniformity.

Q.6) **"From** an enforcement perspective, what specific Federal, State or local agency should have the responsibility for assuring that the requirements of LCV training are met and what form of documentation should be established to prove to prospective employers that adequate LCV training has been successfully completed by a driver? Who should be held accountable if the training requirements are not met, the individual and/or a motor **carrier-** employer?"

A) Compliance with training requirements should be a prerequisite of receiving a first time LCV endorsement. Given that being the system, then the responsibility for enforcement would be shared, as it is now, for the general CDL license among the various state and federal governmental agencies with motor carrier interstate and intrastate oversight.

A common form or format for various certificates that a driver can present to employers, should be established under federal rule which must be used by schools or others offering training.

Accountability to assure training requirements are met should be as follows:

Drivers - seeking an LCV endorsement/authority must be held accountable for satisfactorily completing training under the standards.

Carriers - must take reasonable steps to assure employees they train are adequately trained under the standards established, or that individuals present satisfactory proof of such training if done by a third party.

Schools - or others that provide training intended to qualify a person for LCV operating authority, should be held accountable to assure they meet the requirements of the standards established for LCV driver training.

State Licensing Agencies - should be required to make certain a driver presents the prescribed certificates indicating specified LCV driver training achievement before an LCV endorsement to the CDL is made.

Q.7) **"Should** nonprofit, private organizations, such as PTDIA, be authorized to evaluate and certify the adequacy of LCV training programs?"

A) Yes, as an alternative to the establishment of new federal bureaucracy, nonprofit, private organizations such as PTDIA should be authorized to evaluate and certify the adequacy and LCV driver training programs. That should also include compliance with instructor training and certification requirements.

This should be done under a federal standard of qualifications for such agencies and authorization to conduct requisite evaluations and issue certification of driver training programs. However, the use of such private organizations should be voluntary on the part of motor carriers and trucking schools.

A PTDIA system patterned after FHWA Guidelines for evaluating entry-level tractor trailer training courses already exists. That system has been successfully used to evaluate courses throughout the country. It could easily be modified to accommodate LCV driver training requirements, including instructor qualification criteria.

Q.8) **"What** types of LCV driver training programs exist? Please provide as much detail about cost and course length as possible."

A) LCV driver training varies with individual motor carriers. To our knowledge, there are no **"schools"** that teach a specific LCV course. The length and content of LCV instruction is likely similar company by company, yet varies with needs of individual carriers, depending on the types of **LCVs** operated, and the drivers that they employ. As the Institute has just initiated (under FHWA contract) its development of LCV driver training curriculum outlines, we do not have sufficient data to enable us to provide a more specific response to this question.

Q.9) "Should the implementation of minimum training requirements for LCV operators be "phased in" over a certain period of time? If so, what scenario do you propose and why?"

A) Clearly, LCV driver training must be phased in. The time element for such beginning of requirements will depend on the extent and content of the eventual rulemaking and specific standards. Obviously, the motor carriers and drivers affected must be given adequate time to comply. It would seem that the requirements should apply to persons seeking a first time CDL LCV endorsement after the regulations are first established. Until the specifics of the requirements for LCV driver and instructor training and certification are known, it is difficult to suggest a scenario.

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

A) As implied above, if we are to require training for LCV drivers, the training should be a prerequisite for an LCV endorsement on the CDL.

Q.11) "Should all LCV drivers be required to have previous experience with single trailer vehicles? If so, how much?"

A) While experience with a single trailer combination is not necessarily essential, it is beneficial in the sense of overall competence and safety in driving heavy combination vehicles. It should aid significantly in a transition to LCV driving. However, if adequate training and instructor supervised experience building is provided in an LCV, that could be a satisfactory alternative to single trailer experience.

Q.12) "How often should LCV training be offered/repeated for both instructors and drivers?"

A) Clearly, LCV driver training must be given to first time LCV drivers. Instructors should also be trained initially before they commence instruction. It would also appear that some ongoing or recurrent training or evaluation of skills should be conducted by carriers for their LCV drivers. However, the work of the Institute on LCV driver developing training curriculum has not progressed to the point that it would allow us to make more specific comments on this question.

4.13) "Do specialized vehicle combinations such as triples or those handling special cargo require different training standards?"

A) It is doubtful that specialized vehicle combinations (triples/special cargo trucks) require different standards. The training of such drivers would however, require different curriculum requirements, dependant on the differences inherent in the handling, performance and equipment characteristics of the various types of combinations.

The Institute is at this time developing under FHWA contract, curriculum outlines to establish a guide to training of drivers of triples, turnpike doubles and rocky mountain doubles combinations.