

New Mexico

TAXATION AND REVENUE DEPARTMENT

MOTOR VEHICLE DIVISION
Driver Services Bureau
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AN EQUAL OPPORTUNITY EMPLOYER

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LEADS/REGS. DIV.

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FHWA-97-2199-6

FHWA Docket No. MC-93-12, Room 4232, HCC 10
Office of Chief Counsel
Federal Highway Administration
400 Seventh Street SW.
Washington, DC 20590

Gentlemen:

On the surface it would seem that extending the Commercial Driver License Program to include a minimum level of training for any driver who wants to obtain a CDL is both a reasonable and logical extension, and that it is also desirable from the standpoint of improved highway safety.

On the other hand, when the required changes needed to implement this objective are evaluated, it becomes quite clear that the capabilities and resources required to initially certify and continually audit organizations which provide driver training to operate heavy vehicles is not available to Motor Vehicle Division in the State of New Mexico - and we wonder how many states are in a similar situation.

As we see it, this proposal would only be effective if all elements are uniform, standardized, and certified, throughout the Nation. To begin, there would be a need for a detailed set of standard requirements to be met by every instructor employed by a driving school, along with detailed standards for course content, number of hours classroom training, number of hours of "behind the wheel" and any other factors necessary to objectively evaluate the qualifications of the training entity.

There should be standardized, tamperproof documents to show completion of the authorized training and some uniform procedures established to deal with transfer between states or students who reside in one state and attend training facilities in another state.

If the responsibility to implement this program is to be imposed

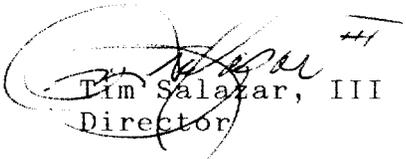


upon the Motor Vehicles Division (MVD), it will require the addition of staff and resources (money) not now available to MVD and since this new activity is being mandated by Federal action, it appears quite clear to us that the source of revenue for this ongoing program should be a direct, continuing, Federal Grant. The New Mexico Legislature has refused to allow an increase in the fee charged to obtain a license to operate a commercial. motor vehicle when we were required to implement the CDL program, and it. certainly seems doubtful that they would be willing to allow an increase in the fee sufficient to cover the cost of another Federal mandate which will also require the applicant to spend **some** undetermined additional amount of money to just to qualify to apply for a CD!,,.

At the present time, if a person wishes to attend a truck driving school, he puts up his money and it is his responsibility to see that he gets enough training to pass the knowledge tests and the skills test. The Motor Vehicle Division is not involved with the quality or quantity of his training. Upon completion, MVD is responsible for administering both the knowledge tests and the skills test. The current CDL program is predicated on the assumption that you can determine the minimum qualification of a commercial driver by testing. Whether this assumption is valid or not, it is now in place, and to add additional factors which require the evaluation of the quality and quantity of training offered a prospective driver, along with the inherent issue of the ability of the prospective driver to comprehend, assimilate, and display the information and skills offered by the training program will certainly complicate matters for Motor Vehicle Division in New Mexico.

With all its limitations and deficiencies, we believe that the present, program of "testing; both knowledge and skills, is the best method to determine whether an applicant is qualified to drive a commercial motor vehicle, and we strongly urge that this additional requirement to obtain a CDL be reconsidered and withdrawn.

Sincerely,


Tim Salazar, III
Director

cc: Mike Calvin, Director of Driver Services, AAMVA