



PROFESSIONAL TRUCK DRIVER INSTITUTE OF AMERICA, INC.

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

The Professional Truck Driver Institute of America (PTDIA or the Institute) provides the following comments to 49-CFR Part 383 (Docket No MC-93-12) **RIN:2125-AD05** concerning the need to:

" require training of all entry level drivers of commercial motor **vehicles (CMVs)** "

FOREWORD

The PTDIA is a nonprofit Institute incorporated in Washington, D.C. with its principal business office in Elk Grove, California. The Institute has as its sole purpose in policy and operations, the development of standards for and the enhancement of adequate training of the nation's truck drivers. The Institute's standards, programs and publications guide the training of tractor-trailer drivers at the entry level. The Institute also offers voluntary certification of courses that meet the standards PTDIA has established. At this time 41 different organizations, motor carriers, public and private schools that offer truck driver training, have courses certified by PTDIA. That certification guides prospective truck drivers in the selection of adequate training and also aids motor carriers in the recruitment of new drivers that have received proper entry-level driver knowledge and skills.

The Institute is the only organization public or private, that has established a standard for the training of entry level truck drivers. As indicated in the ANPRM, the Institute's curriculum and other course certification criteria are an adaptation of the 1984 Federal Highway Administration (FHWA) "**Model Curriculum**". While 41 "**schools**" currently have courses certified, PTDIA has evaluated over 100 different training programs using the PTDIA/FHWA criteria. That has provided extensive insight

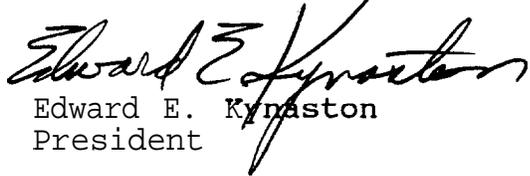
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and understanding of truck driver training in the U.S.

In 1992, the Institute completed a first ever curriculum outline for the training of drivers of twin trailer combinations. That work completed under FHWA contract, is a companion piece to the Institute's original tractor-trailer driver training curriculum. This newest training guide also follows the format and methodology of the original FHWA Guidelines curriculum.

PTDIA is currently under contract with the FHWA to develop curriculum outlines for the training of drivers of triple trailer combinations and long double trailer (twins) combinations. The triples training guide is completed in public draft form and will be the subject of a public review forum on August 27, 1993 in Denver, Colorado.


Edward E. Kynaston
President

PTDIA ANPRM COMMENTS

The following comments are provided in response to pertinent items or questions in the ANPRM and are provided in order and/or by number as expressed in the notice.

SUPPLEMENTARY INFORMATION

While the ANPRM seeks information about the training of entry level drivers of **CMVs**, the Institute's comments will focus primarily on the training of entry level tractor trailer drivers.

Hazardous Materials Drivers

On the matter of excluding training requirements for drivers of vehicles transporting placardable quantities of hazardous materials (HM), it is suggested that exclusion may not be appropriate. The Research and Special Programs Administration (RSPA) regulations apply to knowledge and compliance with regulations for HM loads. Those RSPA training requirements seem to defer to CDL licensing, do not have a specific curriculum and seem to rely on general topical requirements and self certification of the training.

FHWA does need to consider if the training of entry level truck drivers is adequate particularly if they would transport HM. Even if the RSPA regulations are appropriate as they relate to the uniqueness of HM, FHWA should assess the adequacy of training for those drivers in terms of knowledge and skill preparation to just drive the truck. If the loads transported are HM that underscores the importance of such training.

BACKGROUND

Use and Acceptance of the Model Curriculum

As indicated, the Model Curriculum has had a significant impact on the training of truck drivers in the nation. That excellent original work has been the **"bible"** around which the PTDIA has built its standards. However, in assessing its impact on the training of all CMV drivers, it must be remembered it was only a standard for training tractor trailer drivers. While parts of the suggested training are applicable to training of CMV drivers of all vehicle types, it has largely been used for tractor trailer driver training.

Additionally on the findings of the 1989 " Survey of **Tractor- Trailer Driver Training Courses**", at this time the impact of the model curriculum has been lessened by current circumstances affecting training. While the federal curriculum is still followed to some degree by most formalized training, the extent or amount of the training particularly in subject content and hours, has been reduced.

The PTDIA standards have not been reduced and are still met by courses we certify. However, other non-certified programs have been shortened significantly. This comes about primarily by major cut backs in the amount of training money available from the Department of Education administered Title IV student loans and grant programs. Further that situation coupled with some entities training drivers only to the extent necessary to cram for CDL tests has detracted significantly from the best use of the Model Curriculum.

As is recognized, the CDL is a licensing standard, not a training standard. However, some persons are using the CDL knowledge and skill exams as a training guide. Regretfully, time and fiscal constraints preclude the CDL tests from being more than just a sampling of knowledge and skills. Training courses that train only to the level necessary to pass those tests fall greatly below the minimum training intended by the model curriculum.

RULEMAKING AND QUESTIONS FOR COMMENT

On the Adequacy of Entry Level Training Provided

1. How can the adequacy of training be defined?

Adequacy of a program or course of training can be assessed by evaluating how that program complies with standards such as contained within the Model Curriculum or its adaptation in course certification criteria by PTDIA. Also the assessment of training of an individual driver can be through comprehensive testing at the conclusion of training and with evaluating work performance in terms of safety and accident experience.

What mechanisms exist to measure adequacy?

The PTDIA has a complete system for measuring the adequacy of training by comparing courses to established criteria through the medium of administrative, on site and Certification Board review. There are accrediting agencies recognized by the federal Department of Education that also evaluate programs for the purpose of Institutional accreditation. Those agencies however, do not have a common

"training criteria" including uniform curriculum which form the basis for their determination of training adequacy.

2. What standards exist to ensure that training provided by schools and employers is adequate for entry level truck driver training.

There is only one standard. That is the Model Curriculum as implemented through the PTDIA criteria for course certification.

3. What should an adequate truck driver training program include? What is the minimum amount of time that should be devoted to each of these components?

The content of training and the minimum hours should be guided by the Model Curriculum. A summary outline of the PTDIA implementation of that curriculum is attached as Annex A and illustrates a general minimum training regimen.

It should be noted that the hours are expressed as 60 minute clock hours. That means each student should not receive less than 60 actual minutes of training for each hour recognized. That is a very important distinction as many courses are stated in terms of course hours which could include such things as break or rest periods or observation of other students driving. In program evaluation, unless 60 minute clock hours are used, there will not be a true understanding of the actual amount of training students will receive.

4. Can governmental or private standards that guide the training of entry level drivers be used to determine the adequacy of entry level driver training?

Yes as indicated above the Institute has been using such a system for course evaluation since 1988.

Why are these standards appropriate?

They are appropriate because without specific criteria to direct the minimum level of entry level driver training there can be no sense of training adequacy. Up to this point in time the trucking industry has been training its drivers without governmental mandate. Either that training has been adequate or it has not. If it is concluded it has not, then standardized criteria should be considered as the way to resolve that.

5. To obtain a CDL a CMV driver must demonstrate knowledge and skills needed to operate a CMV. Are these tests sufficiently comprehensive to accurately measure a driver's performance?

Regretfully they are not. As indicated above, time, money and logistical considerations dictate the tests only sample knowledge and skill. That does not mean they are inadequate, but they can not serve as an exclusive determiner of training adequacy.

In fact in some respects the CDL tests may encourage a worsening of entry level truck driver training. We have reason to believe that some schools are training mostly against the CDL tests. It is not difficult to have persons practice taking the sample knowledge exams over and over until they can pass the state written exam. Likewise training - actually limited practice just to pass the skill test may be done instead of the more complete training to achieve behind the wheel skill objectives expressed in the model curriculum.

Annex B provides a comparison of training to achieve CDL licensing and what the Institute requires as a minimum for entry level drivers.

6. Should training requirements for entry level CMV drivers be federally mandated.

The training of truck drivers should be done without federal mandate. However, of paramount importance, all entry level truck drivers must be adequately trained. If it is concluded that the training of drivers has been inadequate then federal mandate of training seems appropriate.

NUMBERS OF DRIVERS TRAINED

7. What is an entry level CMV driver?

For the purpose of this rulemaking, an entry level CMV driver is a person that has never been appropriately licensed to drive a CMV on a highway in commerce or otherwise.

8. What industry-wide initiatives or policies, if any, reasonably assure that the majority of all entry level drivers are trained?

The National CDL provides assurance of some minimal training as indicated. Certainly it has been a policy of the trucking industry to support that. The only pure industry

initiative that attempts to assure that entry level drivers have been trained is the PTDIA. While the standards and evaluative resources of the Institute are widely used, since it is a voluntary program, it falls short at this time of assuring the majority of entry level truck drivers are trained.

9. How many truck driver training schools and motor carrier programs train entry level drivers?

This is a very difficult question to answer. The last two years have seen a major decline in the number of trucking schools. In the late 80s that number might have been 500, now it could be 300 or less. Unfortunately, there is no agency that keeps numbers on all the schools. Also not all schools have to be accredited, licensed or certified by a public or private agency and that precludes surveying such institutions. Additionally the number of schools is not as important as the number of drivers being trained and the adequacy of the training. Again no good data exists for the nation.

The Institute at this time has 41 entities, either public or private schools or motor carriers that have courses certified. We estimate there are probably another 150 schools that each train a substantial number of drivers(probably 200 or more) yearly.

What percentage of those enrolled successfully completes such training?

Again in this no national statistics are available. If the schools were surveyed it would likely be determined that nearly 100% complete. They often talk of **90+%** of their students achieving their CDL and of **90+%** job placement rates. Those numbers may be more a function of an aggressive need for drivers by segments of the trucking industry than a true measure of training. It is estimated a better number might be in the 70 to 90% range. PTDIA standards require that not less than 70% of students enrolled must satisfactorily complete a course to maintain its certification.

10. N.A.

11. No information is available to us on this question.

ENTRY LEVEL DRIVER TRAINING COST/BENEFITS

12. Describe the expected benefits and estimated dollar costs for the following:

The expected or desired benefits for all of the various types of training listed would be the adequate preparation of an entry level driver. That may not always be the case depending on the entity providing the training.

Regards costs, while no hard data exists, the following are some estimates based on discussions with various school officials that provide a range from which at least some conclusions can be made.

a. Resident training cost will vary significantly between public and private truck driving schools because of public support. It may be as little as \$50 - \$200 a quarter at some community college - vo-techs. However, some of those may charge larger amounts in the same range as private schools which can be \$1,500 to \$6,000. In assessing these cost estimates one must keep in mind they will probably include other costs such as for living expenses, CDL medical examinations, etc.

b. There are few if any true home study programs in existence such as proliferated in the 80s. Those programs that do combine some home or independent study with residence training are probably funded by Pell grant money. They will likely be longer programs and in the higher cost range of \$5-6,000.

c. Training by motor carriers:

-through-a formal school setting would probably be the same depending on the length and nature of the training. Many of those are in conjunction with a public or private school and the costs and tuition charges to students are probably as indicated above (\$1,500-\$6,000).

-We have no information on the cost of on the job training. That should vary greatly depending on the type and length of training provided, the students learning rate, etc.

d. Externships are often a carrier continuation of resident training at a school. They often involve students using Pell grants that require 600 hours of training. For that reason such training could cost in the higher range near \$6,000. A more recent variant on joint school - carrier training has the student in school for a minimal time such as 3 weeks until they can achieve CDL licensing. After that a carrier continues the training in a "break in mode" with an

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instructor driver providing the training. Costs for such programs may be near \$2,000 at the resident school. There would be additional costs for carriers which may be off set by the training team hauling freight for hire as the balance of the training is completed.

P R O F E S S I O N A L T R U C K D R I V E R
I N S - I - 1 - I - U - I - E O F A M E R I C A
H O U R S O F I N S T R U C T I O N

S T U D E N T H O U R S :
R E Q U I R E D I N S T R U C T I O N **ONLY**

Unit		<u>CLASSROOM</u>	LAB	<u>RANGE</u>	<u>STREET</u>
<u>BASIC OPERATION</u>					
1.1	Orientation	3.25	1.00	0	0
1.2	Control Systems	1.75	0.75	0	0
1.3	Vehicle Inspection	2.00	4.00	0	0
1.4	Basic Control	0.75	0	2.25	0
1.5	Shifting	1.25	0	0.75	0
1.6	Backing	0.75	0	7.00	0
1.7	Coupling and Uncoupling	0.75	0	1.00	0
1.8	Proficiency Development: Basic Control	1.50	0	7.0-10.0	6.00
1.9	Special Rigs	1.00	0	0	0
<u>SAFE OPERATING PRACTICES</u>					
2.1	Visual Search	1.25	0.75	0	2.50
2.2	Communication	1.25	0	0	1.00
2.3	Speed Management	2.00	1.75	0	0
2.4	Space Management	1.75	0	0	1.75
2.5	Night Operation	0.75	0	0.75	1.50
2.6	Extreme Driving Conditions	3.25	4.00	0	0
2.7	Proficiency Development: Safe OPerating Procedures	1.00	0	0	7.5-10.5
<u>ADVANCED OPERATING PRACTICES</u>					
3.1	Hazard Perception	1.50	0	0	2.00
3.2	Emergency Maneuvers	2.50	0	0	0
3.3	Skid Control and Recovery	2.50	0	0	0
<u>VEHICLE MAINTENANCE</u>					
4.1	Vehicle Systems	11.25	2.00	0	0
4.2	Preventive Maintenance and Servicing	1.25	7.50	0	0
4.3	Diagnosing and Reporting Malfunctions	3.00	1.00	0	0
<u>NONVEHICLE ACTIVITIES</u>					
5.1	Handling Cargo	5.00	2.00	0	0
5.2	Cargo Documentation	4.75	0	0	0
5.3	Hours of Service Requirements	5.75	0	0	0
5.4	Accident Procedures	3.00	0.75	0	0
5.5	Personal Health and Safety	5.00	0	0	0
5.6	Trip Planning	4.75	0	0	0
5.7	Public and Employer Relations	3.50	0	0	0
		<u>78.00</u>	<u>25.50</u>	<u>18.75</u> to <u>21.75</u>	<u>22.25</u> to <u>25.25</u>
TOTAL		<u>78.00</u>	<u>25.50</u>	<u>44.00*</u>	<u>147.50</u>

* Total of Range and Street must equal at least 44 clock hours.



PROFESSIONAL TRUCK DRIVER
INSTITUTE OF AMERICA

A COMPARISON OF CDL PREPARATION COURSES AND CERTIFIED TRAINING FOR TRUCK DRIVERS

In some circles, CDL preparation is being promoted as an acceptable replacement for certified truck driving training. This promotion is misguided and may be deceiving.

CDL preparation refers to short courses, workshops, or practices sessions that prepare drivers to take one or more of the Commercial Driver Licenses (CDL) tests. Success is measured by the number of drivers trained or who pass their required tests.

Certified truck driver training refers to training requiring specific units, methods and hours of instruction. This training must meet industry-prescribed and approved standards. Success is measured by the driver's (trainee) ability to meet the knowledge, skill, attitude, and performance objectives of the curriculum. This training is offered by courses following the Tractor-Trailer Driver Curriculum and are certified by the Professional Truck Driver Institute of America.

MAJOR DIFFERENCE

CDL preparation is primarily designed to serve a licensing purpose only. Certified training is primarily for education and training purposes. This is a major difference.

Driver licensing and driver education/training programs have different goals. Both are important, but CDL preparation focuses solely on the licensing and testing process. This means that CDL preparation may not cover all the education and training knowledge and performance requirements important to trucking and the drivers who must fulfill these requirements.

Most of the knowledge and performance requirements for licensing are about protecting the safety of the public. There are many actions and procedures involved in the truck drivers craft which do not present a crash hazard or danger to the highway-using public. Yet these actions and procedures are critical to the drivers personal safety and employability. Likewise, these factors are vital to the success of motor carrier operation.

The CDL licensing process does not include many driver-specific, motor carrier-specific and general safety or operational principles. For instance, CDL testing is daytime-oriented. Hence, little or no emphasis is placed on night operation, especially during behind-the-wheel testing. Certified training requires a number of night driving objectives to be fulfilled.

CDL testing does not require the driver to exhibit a working knowledge of federal regulations (FMCSR) including hours of service requirements, cargo documentation procedures (except for hazmat cargo) and vehicle maintenance requirements to name a few. Certified training requires extensive treatment of these and other non-licensing subjects or factors.

ESSENTIAL KNOWLEDGE AND SKILLS

The licensing process recognizes that there are truck driving knowledges and skills which do not present a public safety threat and which may be acquired after licensing or apart from licensing. As a result, there is a body of knowledge and a domain of driving performances that are essential for certified training but may not be essential (need to know or do) during the CDL licensing/testing process. What this means is that:

- o There are knowledges and skills to be acquired apart from, or before or after licensing.
- o Obtaining a license does not replace the training process.
- o Obtaining a licensing does not end the learning process.
- o The licensing process may not deal with knowledges and skills covered by other essential tests, procedures, and programs.
- o A fairly extensive array of knowledge and skills are to be learned and mastered for reasons other than licensing.

INSTRUCTIONAL TREATMENT

The chart which follows, lists the various subject matter areas which may be considered essential to drivers and their training for entry into commercial trucking. The chart identifies the instructional treatment by CDL preparation courses and certified driver training courses.

The chart is for comparison purposes only. The extent of treatment (full or partial) for CDL preparation may vary greatly because of course duration or length of individual training time. In contrast, a certified course as prescribed by the PTDIA, requires that each trainee receive a minimum of 147.5 clock hours of instruction.

Code: F - - full treatment; P - - partial treatment

SUBJECT AREA	PREPARATION		CLASS- ROOM	CERTIFIED TRAINING		
	KNOW, TESTS	SKILL TESTS		LAB	RANGE	ROAD
1. General Operation of Trucking Industry			F			
2. Major Parts of a Tractor-Trailer	P		F	F		
3. Role and Values of Professional drivers			F			
4. Vehicle Control Devices	P	P	F	F	F	F
5. Vehicle Systems Monitoring Devices	P	P	F	F	F	F
6. System Procedures for Conducting Complete Vehicle Inspections	P	P	F	F		
7. Pretrip Inspection Procedures	F	F	F	F		
8. Enroute Inspection Procedures	P		F			F
9. Post-Trip Inspection Procedures	P		F			F
10. Discovery and Correction of Malfunctions	P		F	F		
11. Start Up and Shutdown of Engine	P	P	F		F	F
12. Forward and Backward Acceleration	P	P	F		F	F
13. Forward and Backward stops	P	F	F		F	F
14. Backing in a Straight Line	F	F	F		F	
15. Positioning and Negotiating Turns and Corners	F	F	F		F	F

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SUBJECT AREA	CDL PREPARATION		CERTIFIED TRAINING			
	KNOW, TESTS	SKILL TESTS	CLASS- ROOM	LAB	RANGE	ROAD
16. Shifting Procedures and Patterns	P	F	F		F	F
17. Development of Upshifting Skills	P	P	F		F	F
18. Development of Downshifting Skills	P	P	F		F	F
19. Shifting Techniques Double-Clutching, etc.	P	F	F		F	F
20. Backing Principles	P	P	F		F	
21. Backing in Straight and Curved Paths	P	F	F		F	
22. Back into Alley Dock	F	F	F		F	
23. Parallel Park	F	F	F		F	
24. Park in Jackknife Position	F	F	F		F	
25. Trailer Path and Clearances (side, rear, & overhead)	P	P	F		F	
26. Backing Hazards	P	P	F	F	F	
27. Coupling Procedures	F	F	F	F	F	
28. Uncoupling Procedures	F	F	F	F	F	
29. Proficiency in Basic Operation: Skills/Maneuvers	P	F	F		F	F
30. Practicing Basic Operation in Low Density Traffic	P	P	F			F
31. Practicing Basic Operation in Moderate Traffic	P	P	F			F
32. Characteristics of Special Rigs and their Hazards	F	F	F	F		
33. Observation of Special Rigs			F	F		
34. Observation of Special Rigs during On-Street Practice						F

SUBJECT AREA	CDL PREPARATION		CERTIFIED TRAINING			
	KNOW, TESTS	SKILL TESTS	CLASS- ROOM	LAB	RANGE	ROAD
35. Bobtail Operation			P		P	
36. Principles of Visual Search	F		F	F		F
37. Use of Mirrors	F	F	F	F	F	F
36. On-Street Visual Search Techniques	F	F	F			F
39. Principles of Communication in Traffic	P	F	F			F
40. Use of Signaling and Communication Devices	P	F	F			F
41. On-Street Communication Techniques	P	F	F			F
42. Speed Management Principles	P	F	F	F	P	F
43. Demonstrations of Effects of Speed				F	F	
44. Managing Speed in On- Street Driving	F	F	F			F
45. Space Management Procedures and Principles	F	F	F		P	F
46. Space Management Maneuvers (passing; Lane use, etc.)	P	F	F		P	F
47. Managing Space in Traffic	P	F	F			F
48. Principles for Night Operation	P		F		E	F
49. Use of Headlights and Auxiliary Lighting	F		F		F	F
50. inspecting and Maneuvering Vehicle at Night (range)			F		F	
51. On-Street Application of Night Driving Principles			F			F

SUBJECT AREA	CDL PREPARATION		CERTIFIED TRAINING			
	KNOW, TESTS	SKILL TESTS	CLASS- ROOM	LAB	RANGE	ROAD
52. Principles and Hazards of Driving under Extreme Conditions	P		F	F		
53. Procedures for Handling Extreme Conditions	P		F			
54. Demonstration of Tow Cables and Snow Chains			F	P	P	
55. Vehicle Operation Under Extreme Conditions (when possible)	P		F			
56. Procedures in Safe Operation: Techniques/ Maneuvers	F	F	F			F
57. Practicing Safe Operation on Uncontrolled Urban and Rural Roads		P				F
58. Practicing Safe Operation on Expressways/Freeways		P				F
59. Practicing Safe Operation in Light to Heavy City Traffic		P				F
60. Principles of Hazard Perception	F		F			F
61. Response to simulated Hazardous Situations			F			
62. Practicing Commentary Driving			F			F
63. On-Street Application of Hazard Recognition Principles		P				F
64. Maneuvers and Procedures for Responding to Emergencies	P		F			
65. Emergency Response Principles	P		F			

SUBJECT AREA	CDL PREPARATION		CERTIFIED TRAINING			
	KNOW, TESTS	SKILL TESTS	CLASS- ROOM	LAB	RANGE	ROAD
66. Causes of Skidding and Jackknifing	F		F			
67. Techniques for Avoiding and Recovering from Skids/Jackknifes	F		F			
68. Demonstrating Skid Control and Recovery Procedures			F			
69. Function and Operation of All Key Vehicle Systems	P		F	F		
70. Identification of Systems' Parts	P		F	F		
71. Principles of Preventive Maintenance and Servicing			F	F		
72. Demonstration and Practice of Preventive Maintenance Checks and Procedures			F	F		
73. Identification of Vehicle Malfunctions			F	F		
74. Troubleshooting Problems and Emergency Repair Exercise			F	F		
75. Basic Principles of Loading and Unloading Cargo	P		F	F		
76. Practice Loading a Vehicle or Observe Loading Operation			F	F		
77. Hazardous Cargo Placarding Requirements	F		F			
78. Hazards of Improper Loading	F		F			
79. Use of Cargo Handling Equipment and Materials			F			
80. Basic Forms and Procedures Required when Driving Handles Cargo			F			

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SUBJECT AREA	CDL PREPARATION		CERTIFIED TRAINING			
	KNOW, TESTS	SKILL TESTS	CLASS- ROOM	LAB	RANGE	ROAD
81. Cargo Paperwork Responsibilities and Requirements			F			
82. Demonstration of Proper Form Completion and Student Practice			F			
83. Requirements of Federal Hours of Service Regulations			F			
84. Demonstration of Procedures for Completing Logs			F			
85. Practice in Filling out Logs			F			
86. Use of Duty Status Record to Record Time used During Course			F			
87. Accident Procedures and Reporting Requirements	F		F			
88. Use of Fire Extinguishers and Basic Firefighting Techniques	F		F			
89. Demonstration of Fire Extinguisher Use			F	F		
90. First Aid Materials and/or Training			P			
91. Physical Requirements for Driving	P		F			
92. Basic Health Maintenance Requirements	P		F			
93. Use of Alcohol and Drugs and Avoidance of Fatigue	F		F			
94. Common Non-Driving Safety Hazards			F			
95. Safety Practices and Equipment	F	P	F	P		

SUBJECT AREA	CDL PREPARATION		CERTIFIED . TRAINING			
	KNOW, TESTS	SKILL TESTS	CLASS- ROOM	LAB	RANGE	ROAD
96. Background and Character Requirements for Successful Drivers			F			
97. Trip Planning Requirements and Importance			F			
98. Legal Restrictions on Vehicle Size and Weight	P		F			
99. Trip Forms, Permits, and Paperwork			F			
100. Map Reading			F			
101. Route Planning Practice and Procedures			F			
102. Public Relations Problems of Trucking Industry			F			
103. Maintaining a Good Image of Self and Trucking			F			
104. Dealing with Public and Customers			F			
105. Employer Relations and Employability			F			
106. Student Practice Interview for Job			F			
107. Presentation by Trucking Company Representative			F			
108. Exhibiting Courtesy and Professionalism during On-Street Practice	P		F			F
109. Handling Unsafe or Discourteous Acts of Other Drivers	P		F			F

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