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August 9, 1993

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

We are responding to the request for comments concerning the proposed rulemaking requiring mandatory training for entry level truck drivers. To give you some background, our school was founded in 1987 by Cummins Engine Company to fill a void in the truck driver training industry. We established a 6 week, 240 hour program that included approximately 70% "hands-on" training. The graduates of that program met with immediate acceptance from the trucking industry and placement was 97% or higher. In order to become eligible for Federal student loans in 1987 we were required to expand our program to 300+ hours. When the student loan programs were cut drastically last Fall, we voluntarily chose to withdraw.

We are currently providing dedicated carrier training for Schneider National Carriers, Frozen Food Express, PAM Transport, and Transport America. This training is 120-130 hours in length and last from 2 to 3 weeks. It is based on the performance of skill objectives. Our philosophy is similar to the NTSB report issued in April, 1986 on training, licensing, and qualification standards for drivers of heavy trucks. The report states ". . .factors determining the effectiveness of a training program include: the number and qualifications of the instructors; the instructor/student ratio; and the availability of training aids. . . . But the most crucial factor is usually the amount of time the student spends in and around the cab of a truck. . . ." We spend over 75% of the training time "in and around the cab of a truck". The student/instructor and student/truck ratio is 2:1. And we have an instructor force that averages over 20 years of truck driving experience.



FHWA DOCKET MC-93-12-18  
PAGE 1 OF 3

In regards to the specific questions presented in the Federal Register, Vol. 58 No. 117, dated 6/21/93 we would like to respond accordingly:

1. How can the adequacy of training be defined? What mechanisms exist to measure adequacy?

Training should be measured by the attainment of **specific skill objectives**, NOT by time. A student should be tested on skills such as straight line and sight side backing, right and left turns, and parallel parking. Minimum testing scores should be recorded. A student should be required to score 80% or better on each exercise. A final road test should be conducted measuring such items as the drivers knowledge of proper gear selection, use of the clutch, use of signals, courtesy on the highway, defensive driving habits, following too closely, general attitude, etc. Points would be deducted for each incident and a score of 80% or better should be required to graduate.

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

We feel that the requirements to provide proper training already exists for schools and employers. If a school fails in its responsibility to train quality drivers then carriers will no longer hire their students. We have seen that recently around the country with some of the poorer quality schools no longer in business. Carriers/employers are being watched closely by the insurance industry and their own Risk Management/Loss Prevention departments to reduce claims and accidents in order to prevent unnecessary expense and costly law suits.

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

As in question number one, our response is not how many hours should be required but what skill level has the student reached. It would be an injustice to mandate a specific numbers of hours for training and force a qualified student to remain just in order to qualify for federal funding or comply with regulations. This would deprive them from getting with their employer sooner, making money, and providing for their family. It also says that if federal funds would be made available for such training then taxpayer money would be spent needlessly.

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...

We are an authorized CDL Third Party test site for the State of Indiana. We are definitely in favor of the principles by which the CDL was established but feel that it is inadequate in some areas. It is our opinion that there should be an additional class of license added or two Class A categories. An individual with a Class A license is allowed to drive ANY combination vehicle, including a semi tractor/trailer, even though they are only capable of driving equipment such as a dump truck pulling a lowboy trailer. And repeated training in different states indicates that CDL testing is not strictly and uniformly enforced in each state.

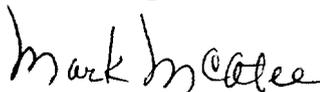
We are of the opinion that if the trucking industry and the federal government feel that a deficiency exists in the training of entry level drivers it should be corrected by tougher testing standards, ie; the CDL test. If those standards are high then it would only seem logical that the training standards to pass those tests would be as high.

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

Referring back to question number two, we feel that the industry will police itself. Given the nature of todays economy and competitive business atmosphere, carriers and schools alike must establish and maintain an effective training program for entry level drivers. Undue intervention by the federal government would only add to the cost and time required to complete training.

In summary, we feel that with the partnership of a reputable carrier and school, entry level truck drivers will obtain the training they need. The school will see that the student is given sufficient time and practice to master the basic skills of backing, shifting, and vehicle control on public highways. And the carrier will put that driver with an experienced driver trainer for a time period of no less than two weeks to sharpen their skills and see if they can handle the rigor-s of cross country driving.

Sincerely,



Mark **McAtee**  
Director of Training