

CITIZEN

AUTO STAGE CO. • EXPRESS LINES

QA-17974

LEBON/NEES, INC.
93 AUG 15 4:10:20

DATE: 8-10-93

TO: FHWA Docket No. MC-93-12
Room 4232, HCC-10
Office of Chief Counsel
Federal Highway Administration
400 Seventh St., S.W.
Wash, D. C. 20590

FHWA-97-2199-21

TO WHOM IT MAY CONCERN,

This letter is in response to an article in J.J. Keller's "Motor Carrier Safety Report" No. 7, Vol XIX, Jul 1993. The article asks that **comments** be submitted on the training of **entry-level** commercial drivers.

I'll preface **my comments** by saying I'm not a "big government. type of person. I **do** feel, however, that government should be involved in certain things. One of which is public safety.

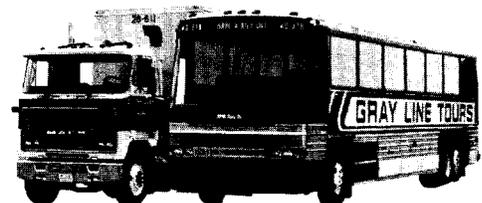
We've all had sufficient time to see and evaluate the effectiveness of the Commercial Driver's License program. Many are proclaiming it a resounding success. I, for one, have a slightly different opinion about the program.

As with **most** programs, no matter how tight the controls, there will always be those who find a way to "beat the **system**." I personally feel that the Third Party Tester portion of the CDL program has contributed to a partial failure of the program. This, I feel, is where the abuses are occurring.

We, as a company, elected not to **become** Third Party Testers. As a result, we have had **some** trainees fail their CDL practical **exams**. But this is not all bad. Our reasoning for not becoming Third Party Testers was that we feel trainees and trainers **seem** to maintain a higher level of concentration and preparation when they know they are going to be Judged by an impartial examiner. There's nothing quite like having to demonstrate your driving skills in front of a uniformed officer, knowing that there is no opportunity for shortcuts and a trainee **must** learn everything to the best of their ability so they don't fail during their test.

FHWA DOCKET MC-93-12-19
PAGE 1 OF 2

General Office: 2520 N. Baffert Dr. • Nogales, AZ 85621 • (602) 281-0400
Sales: P.O. Box 1991, Tucson, AZ 85702 • (602) 622-8811 • Fax (602) 622-8838
Operations/Maintenance: 351 S. Brickyard Ln., Tucson, AZ 85745 • (602) 624-6609



Furthermore, the driver trainers in our Company don't cut any corners in training because their effectiveness as a trainer is Judged in part by how well their trainees perform on the practical driving test. Quite simply, there is no way of "faking it" in front of professional examiners who do nothing but administer these tests day in and day out.

The stakes are too high to delegate driver certification to individual companies. I have personally heard many first-hand horror stories from some very credible sources about abuses by Third Party Testers. Some transportation companies, because of a high turnover rate, are tempted (and do) to cut corners Just to keep the fleet rolling - - and they do cut some big corners.

As for the direct government involvement in establishing training programs for entry level commercial drivers - - I feel confident that if government does away with the Third Party **Testing** and takes back full responsibility for all phases of testing (written, skills test, pre-tripping, and road testing), transportation companies will be forced into administering adequate training, thereby negating the need for a government established/controlled driver training program. The standards and the information professional drivers must learn is already in place. It's Just up to the government to administer tests to **make** sure that proper training and compliance is taking place.

But, we don't want or need the government to place any more regulations on the transportation industry - - we have enough in the way of government programs and regulations. The secret to **success** is in the enforcement side of the existing regulations. It wouldn't hurt to make the examinations **more** extensive if need be to make sure more thorough training and learning are taking place. But we don't need any more government programs or regulations making our lives any more complicated than they already are.

Regards,


DAVID PETERSEN
Operations Manager