



MARYLAND DEPARTMENT OF TRANSPORTATION
MOTOR VEHICLE ADMINISTRATION

O. James Lighthizer
Secretary

W. Marshall Rickert
Administrator

QA-18012

FHWA-97-2199-44

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LEGS./REGS. DIV.

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

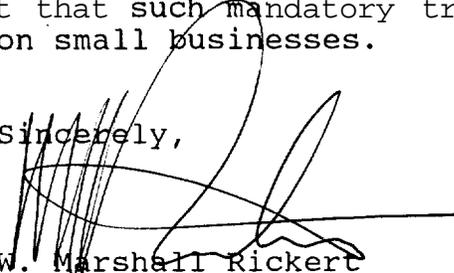
Dear Sirs:

The Maryland Motor Vehicle Administration's comments on FHWA Docket No. MC-93-12 Training for All Entry Level Drivers of Commercial Motor Vehicles are provided at attachment A.

The Maryland Motor Vehicle Administration has two serious misgivings about a proposal that would mandate entry level training for all drivers of commercial motor vehicles. These are:

- o The differences among the various definitions of commercial motor vehicle in parts 325, 383, 390, and 391 of Title 49 Code of Federal Regulations.
- o The severe economic impact that such mandatory training requirement might impose on small businesses.

Sincerely,


W. Marshall Rickert
Administrator

WMR/jv

c c : Lt. Col. John Lyding
Mr. Mike Calvin

FHWA DOCKET MC-93-12-42
PAGE 1 OF 8

ATTACHMENT A

A. Comments on the Adequacy of Entry Level Training.

Question 1.

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

Comment.

At best, adequacy of training is subjective. It will be extremely difficult to establish a uniform nationwide standard other than that which is currently required (i.e., passing the CDL knowledge and skills tests).

One must consider the implications of nationwide training standards. Can an individual who receives his entry level training on the flat Eastern Shore of Maryland be expected to handle harsh winter conditions of Western Maryland? In many cases, there may be no need for extensive training. It is not possible to predict that a new driver will ever leave his locality.

The only practical measure of adequacy is an individual's ability to pass the CDL knowledge and skills tests.

Question 2.

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

Comment.

See comment to question number 1.

Question 3.

What should adequate truck driver training programs include (for example, night driving, behind-the-wheel training, and classroom instruction)? What is the minimum amount of time (or number of hours) that should be devoted to each of these components?

Comment.

There is no reason to presuppose that all drivers are going to drive the same vehicles in the same environment. Therefore, it is improper to attempt to dictate federal standards.

Question 4.

Can governmental or private standards that guide the training of entry level drivers be used to determine the adequacy of entry level training? Why are these standards appropriate?

Comment.

Governmental and/or private standards should not be used to determine the adequacy of entry level training.

Such standards are not appropriate. The adoption of such standards would serve little purpose other than to make it prohibitive for small (1 to 10 man) companies to use entry level drivers. Many larger companies already will not hire drivers and the combined effect will be injurious to our economy.

Question 5.

To obtain a CDL, a CMV driver must demonstrate knowledge and skills to operate a commercial motor vehicle. Are these tests sufficiently comprehensive to accurately measure a driver's performance Please explain why or why not. Provide information on specific deficiencies.

The CDL tests are adequate. Prior to CDL, few states had in-vehicle testing programs. The states have all expended considerable resources and time to make the CDL program work. The existing CDL testing program is valid with but a few problems.

The largest number of CDL drivers are individuals who drive Class B (straight trucks over 26,000 pounds (GVW) rather than Class A vehicles. Most of the available training is concentrated on tractor trailers.

In Maryland, there are 111,627 CDL holders. Of these, there are :

- o Class A - 55,944
- o Class B - 51,822
- o Class C - 3,861

For the fiscal year ending June 30, 1993, the State of Maryland had the CDL knowledge and skill testing passing rates shown below.

General Knowledge	-	57%
Air Brakes	-	68%
Combination Vehicles	-	71%
Passenger Transport	-	66%
Doubles/Triples	-	65%
Tankers	-	68%
HAZMAT	-	60%
Class A Skills	-	43%
Class B Skills	-	45%
Class C Skills	-	50%

These passing percentages point out that the CDL tests are stiff, require adequate preparation, and are a good measure of a driver's ability to be an "entry level driver".

It is recommended that FHWA review the passing rates of third party skills tests to ensure that this is not the easy route to a CDL.

Question 6.

Should training requirements for entry level CMV drivers be federally-mandated?

Comment.

No. Discussions with companies that operate CMVs, as well as industry groups, led this State to the belief that the best thing that the federal government can do with regard to training is to stay out of it, except to ensure that federal grant and loan programs are not manipulated by fraudulent training schools and programs.

Question 7.

What is an entry level CMV driver?

Comment.

A potential CMV operator with no prior CMV driving experience.

Question 8.

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

Comment.

The requirement for a CDL and insurance rates.

Question 9.

How many truck driver training schools and motor carrier programs train entry level drivers? What percentage of those enrolled successfully complete such training?

Comment.

PRIVATE CAREER SCHOOLS

- a. There are currently three private career schools approved to offer tractor trailer driver training programs in Maryland; Diesel Institute of America (DIA), New England Tractor Trailer Training School of Massachusetts Inc. (NETTTS) and All-State Career School, Inc.
- b. These three schools enrolled 1,115 students during the most recent reporting year.
- c. 832 or 74% of these students completed their training.
- d. 568 or 68% of these were reported to have passed the CDL and were placed in training related jobs.
- e. The average cost of these training programs was about \$4,100, with the schools in aggregate approximately \$4.45 million in tuition revenues on an annual basis.
- f. Using \$20,000 as the approximate average entry level, annual income for newly trained drivers, about \$11.36 million in individual income, is pumped into the economy on an annual basis.

COMMUNITY COLLEGES

- a. There are currently three community colleges offering tractor trailer driver training programs in Maryland; Cecil Community College, Dundalk Community College (in conjunction with Cecil), and Charles County Community College.
- b. These three community colleges enrolled 143 students during the past year.
- c. 130 or about 90% of these students completed their training.
- d. 120 or about 92% of these were reported to have passed the CDL and were placed in training related jobs.
- e. The average cost of these training programs was about \$2,750 with the community colleges in aggregate generating approximately \$350,000 in tuition revenues on an annual basis.
- f. Again, using \$20,000 as the approximate average entry level annual income for newly trained drivers, about \$2.4 million in individual income was pumped into the economy in the past year by these community college program graduates.

COMBINED FIGURES FOR BOTH SEGMENTS

- a. There are a total of six approved training programs in the state when the community colleges and private career schools are combined.
- b. These six programs enrolled 1,258 students during the past year.
- c. 962 or about 76% of these students completed their training.
- d. 688 or about 71% of these were reported to have passed the CDL and were placed in training related jobs.
- e. The average cost of all six training programs combined was about \$3,500 with a total of approximately \$4.8 million in tuition revenues on an annual basis.
- f. Using \$20,000 as the approximate average entry level annual income for newly trained drivers (this figure

may be somewhat on the conservative side), an overall total of about \$13.76 million in individual income is pumped into the economy on an annual basis.

It should be noted that, as of July 31, 1993, the Maryland Motor Vehicle Administration issued 7,676 valid Class A and B Learner's Instructional Permits in Maryland. It should be obvious that:

- o Insufficient capacity exists within this State to conduct training.
- o The training is expensive. \$2,750.00 is the lowest cost program.

Question 10.

Is the successful completion of an entry level CMV driver training program (either before or after hiring) a requirement for the drivers employed by your company?

Comment.

An informal survey of industry groups and companies provided a wide berth of responses. One large local employer noted that they only hire experienced drivers and require in-house training prior to allowing new drivers on the road. At the other extreme, no additional training is required by other companies.

The general tenure is "as required".

Question 11.

Describe the training opportunities available for drivers of smaller trucking companies/owner operators. What percentage of those enrolled successfully complete such training.

Comment.

There are no data available.

Question 12.

Describe the expected benefits and estimated dollar costs.

Comment.

See response to question number 10.

General question.

There appears to be little, if any, financial support available to sponsor driver training. However, the following comments were received from our informal poll of industry groups and local companies.

- o Mandatory driver education/training will have an economic impact on an already stressed industry. Three local companies that hire entry level drivers report a total compensation package ranging from \$12.50 to \$20.00 (average \$17.00). Additional training costs will either come out of compensations or be added to rates.
- o Almost all of the respondents to our informal survey noted that the economic impact would be most severe on small companies (father-son) and owner-operators.