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Comments of
AMERICAN TRUCKING ASSOCIATIONS
On
TRAINING FOR ALL ENTRY LEVEL DRIVERS
OF COMMERCIAL MOTOR VEHICLES

FHWA Docket No. MC-93-12
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**Without Trucks
America Stops**



Training for All Entry level Drivers of Commercial Motor Vehicles

FOREWORD

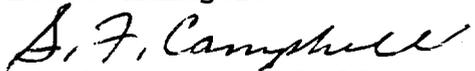
These comments are submitted on behalf of the American Trucking Associations (ATA) and the Interstate Truckload Carriers Conference (ITCC or Conference), 2200 Mill Road, Alexandria, Virginia 22314-4677. ATA is the national trade association of the trucking industry. Through its affiliated trucking associations located in every state and the District of Columbia, 10 affiliated conferences, and their 30,000 motor carrier members, ATA represents every type and class of motor carrier in the country -- for hire and private, regulated and exempt.

The Interstate Truckload Carriers Conference is the only national trade association representing the common and contract truckload segment of the motor carrier industry. The Conference represents approximately 600 dry van, refrigerated, flatbed, and dump-truck truckload carriers domiciled in the 48 contiguous states and serving those states and the state of Alaska, Mexico, and the Canadian provinces. The Conference's members operate more than 140,000 tractors and 280,000 trailers, and have combined annual revenues exceeding \$14 billion. The Conference is affiliated with the American Trucking Associations.

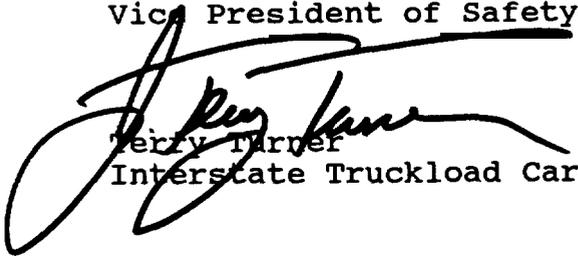
ATA has initiated numerous programs for the trucking industry to help attain safety related objectives, including: training programs for drivers, supervisors, and driving schools; management programs to assure safe vehicles, safe drivers, and safe operations; research to reduce accident experience; and cooperative programs to improve vehicle performance, especially in the area of truck brakes.

We have also been strong and early advocates for the establishment of the Motor Carrier Safety Assistance Program; creation of a commercial driver's license; elimination of the commercial zone safety exemption; voluntary adoption of electronic record keeping for hours of service; implementation of brake improvement research; requirements for drug and alcohol testing; eliminating drugs at truck stops; and banning radar detectors.

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SUMMARY:

The trucking industry recognizes the importance of employing skilled, knowledgeable, and trained drivers. Over the past several years, motor carriers have expanded efforts to ensure that drivers operating their equipment are properly qualified. Carriers have and continue to spend millions of dollars training and educating drivers on areas related to the Commercial Driver Licensing requirements. Many motor carrier training initiatives substantially exceed the fundamentals covered in the CDL program. Trucking operations are also continuing to dedicate significant resources to drug and alcohol testing and other driver-based improvement programs.

Many segments of the trucking industry have, on a voluntary basis, adopted the Federal Highway Administration's Model Curriculum for Training Tractor Trailer Drivers. In an effort to improve the quality and professionalism of truck driver training programs throughout the country, motor carriers have also supported the development of industry standards for training truck drivers by the Professional Truck Driver Institute of America (PTDIA) and its voluntary course certification program.

The combined safety-related efforts of the motor carrier industry to improve the skills and knowledge of drivers are proving to be beneficial. According to the National Highway Transportation

Safety Administration (NHTSA), for the ten-year period between 1981 and 1991, fatal accidents involving medium and heavy trucks have decreased 17%; the fatal accident rate has dropped 40%; and the number of fatalities has decreased 17% -- all while vehicle miles of travel for medium and heavy trucks has increased 38.7%. Motor carriers partially attribute the improvement to increased and improved training of commercial drivers.

POSITION

The Executive Committee of the American Trucking Associations has established a task force to assess the status of entry level training throughout the trucking industry. The task force is exploring various methods motor carriers use to train entry level drivers prior to putting the drivers in service. More importantly, the task force is exploring additional means that would further ensure that all entry level drivers are skilled and qualified prior to driving a commercial motor vehicle. The following answers were developed with the assistance of the task force.

QUESTIONS & ANSWERS

- Q1. How can the adequacy of training be defined? What mechanisms exist to measure adequacy?
- A1. Adequacy of truck driver training can be defined by first conducting a job skills analysis to identify all of the tasks associated with driving a CMV. Once the tasks are identified, all of the skills and knowledge required to gain mastery of the tasks must also be determined. An adequate

curriculum for training truck drivers would then be built based on the full skills and task analysis.

B1. The current PTDIA certification process is the one system most typically used to measure the adequacy of truck driver training programs. Comparing a truck driver training program against the established PTDIA standards (see Tractor Trailer Driver Curriculum -- The Units of Instruction and Their Requirements) currently provides an indication of the adequacy of the overall program. The adequacy of training can also be measured by comparing the accident rates of trained drivers versus the rates of untrained drivers. Additionally, training adequacy can be measured through comprehensive skills and knowledge tests.

Q2. What standards exist to ensure that training provided by schools and employers is adequate for entry level truck driver training?

A. ATA is not aware of "standards" which exist beyond those utilized by PTDIA to ensure adequacy of driver training programs.

Q3. What should an adequate truck driver training program 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?

A. As outlined in Attachment A, the PTDIA minimum standards for program certification should serve as an industry baseline for entry level training.

Q4. 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?

A4. The true measure of the adequacy of training is the accident and loss experience of those drivers trained under the specified standards. Trying to determine adequacy through a review of government or private standards would only provide an indication that the curriculum addresses the necessary elements in sufficient detail. If the federal government works together with the industry to ensure that effective, reasonable, and viable standards (like the PTDIA standards) continue to be used to guide entry level training, the joint role of government and industry will be to monitor the accident experience of those drivers trained under the standards and determine where improvements need to be made.

4B. The existing PTDIA standards are appropriate because government and industry have worked closely with the PTDIA to ensure that these standards effectively serve as the minimums for entry level driver training. It should be noted that most driver training programs exceed these minimums. Many motor carriers augment this training with additional

classroom and behind-the-wheel training customized to the carrier's specific operations. With regard to the monitoring of additional needs, the federal government and industry have worked together to further ensure that training standards are being developed for specialized needs. For example, the PTDIA has developed under contract to FHWA training curricula for drivers of twin trailers and longer combination vehicles. Although these standards do not directly address the entry level training issue, development of these standards demonstrates that the trucking industry continues to work together with the federal government to ensure that these specialized training needs are being met through the timely development of pertinent standards.

Q5. 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?

A. The CDL program serves an important role in providing a system that insures that drivers have only one commercial license. The CDL program is effective in insuring that drivers have the fundamental knowledge and skills to pass knowledge and skills tests. It is not reasonable to expect that one's actual performance can be adequately measured solely through the existing CDL program.

Q6. Should training requirements for entry level CMV drivers be federally mandated?

A. Government mandated training requirements may create an unnecessary compliance and cost burden for the trucking industry. As evidenced by the declining accident and fatality rates for medium and heavy trucks, motor carriers are continuing to make improvements in the general area of driver training. More and more carriers are implementing formal, in-house training programs for new and experienced drivers and more will continue to develop their own programs based on the needs of their particular segment of the industry. ATA will be in a position to more adequately address this issue based on the outcome of the ATA Executive Committee meeting in November 1993.

Q7. What is an "entry level CMV driver?"

A. An "entry level CMV driver" should be defined as a driver who does not have a CDL to operate a commercial motor vehicle as defined in the FMCSRs @ Part 383.5. Alternatively, an entry level driver could be defined as a CDL holder who is seeking to drive a more restrictive class of vehicle, e.g., a Class B CDL holder who wants a Class A CDL.

Q8. What industry-wide initiatives or policies, if any, reasonably assure that the majority of all entry level drivers are trained?

A. The closest industry-wide initiative that provides any reasonable assurance that entry level drivers are trained is the CDL program. Through the knowledge and skills tests associated with CDL, drivers must demonstrate a certain level of skill and proficiency in order to obtain the license. In addition to the CDL requirements, carriers are currently required to administer a written test and road test to non-CDL drivers prior to putting a driver in service with their company. In addition to the requirements of the CDL program, many motor carriers conduct extensive entry level training specific to the equipment and materials being transported. For example, carriers that operate tank trucks conduct specialized training on the commodities being transported and they also train the drivers on unique handling characteristics of liquid loads, etc.

Two other factors that help insure the training of drivers are customer demands and highway liability concerns. Shippers want trained drivers who deliver on time without any cargo damage. Motor carrier concerns about liability exposure in the event of an accident also helps insure trained drivers.

Q9. How many truck driver training schools and motor carrier programs train entry level drivers? What percentage of those enrolled successfully completes such training?

9A. Estimates indicate that there are approximately 150 to 300 proprietary, public and/or vocational-technical truck driver training schools in the United States. This number appears to be very fluid because of school failures resulting from the reduction in the limited student loan funding available for truck driver training.

Although specific numbers are not available, we believe that fewer than 20% of the motor carrier operations throughout the country have complete, formalized in-house driver training programs in place to train entry level drivers. By complete, formalized training programs, we are referring to in-house programs that meet or exceed the 147.5 hour minimums established by PTDIA for course certification. While it may be a limited number of carriers that have formalized entry level training programs in place, we estimate that more than 80% of motor carriers have ongoing, periodic training programs in place for their in-service drivers.

9B. With regard to the percentage of enrolled students who complete the training, we believe that 60% to 70% of those students who start the programs actually finish.

Q10. 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?

A. Although ATA does not maintain a national database containing

the hiring and training policies for motor carriers, we have completed surveys and discussed this issue at several ATA meetings. Some motor carriers will recruit and hire a percentage of their entry level drivers from truck driver training schools. In these cases, carrier policy generally requires that those new recruits receive additional supplemental training specific to the carriers equipment and operations. The combined school and carrier training, as defined by many carriers, constitutes completion of a formalized program. Conversely, a great percentage of carriers will not hire drivers unless they have "X" amount of over-the-road driving experience, a clean driving record, and positive employment history. Even in the cases where carriers are recruiting drivers from other segments of the industry, the newly recruited drivers will typically receive training specific to the carrier's operations. This training can range from a one-day orientation program to a more extensive, one to three month program. The nature and length of the training for experienced drivers who have recently been hired into a new system depends largely upon company policy, the exact experience and past driving record and employment history of the individual driver(s). The industry trend seems to indicate that more and more motor carriers are implementing in-house driver training programs to help ensure that all entry level drivers are adequately prepared to operate commercial motor vehicles.

Q11. Describe the training opportunities available for drivers of smaller trucking companies/owner operators. What percentage of those enrolled successfully completes such training?

A. Based on the input from small company operators, ATA believes that between 5% to 10% of small companies offer some type of formalized or structured driver training. However, we feel that it is important to note that the majority of small trucking operations do not have problems with driver turnover. Consequently, the initial training conducted by these companies provides long term benefits because the drivers remain with the companies for longer periods of time.

A1. Out of the total population of drivers who receive training from small companies, we have no reason to believe that the percentage of these students who complete training within small company operations would be any different than the 60% to 70% estimate for all other motor carriers.

Q12. Describe the expected benefits and estimated dollars costs for the following types of training:

A. The expected benefits for all of the various types of entry level training would be the adequate preparation of entry level drivers. Drivers would be expected to attain mastery of the knowledge and skills necessary to safely operate a commercial motor vehicle in interstate or intrastate commerce.

Q.12a) Costs for resident training at public and private truck driver training schools, including trade, vocational, and community college programs?

12a. Resident training costs will vary significantly between public and private truck driving schools because of the public support. Costs may range from \$50 to \$200 per quarter at some community colleges. On the other hand, costs can be as high as \$6000 for the complete program at a private school.

Q12b) Costs for home study or correspondence courses in combination with hands-on behind-the-wheel training?

12b) If there are any home study/correspondence programs still in existence, they will likely be combined with resident training and the total cost for the complete program will be in the \$4000 to \$6000 range.

Q12c) Costs of training by motor carriers through: formal school setting, on the job training, and externships, i.e., combination truck driver training schools and motor carrier operations?

12c) Motor carrier training program costs vary significantly from one operation to the next. Training costs through a formal school setting are consistent with the average cost for a standard 320 hour program within a truck driver training

school) these costs are typically in the \$3000 to \$5000 range. Costs for on-the-job training by motor carriers will also vary significantly from operation to operation, depending upon the length of the program, the nature of the program, the amount of behind-the-wheel training, the number of trainees going through the training at the same time, etc. As a general estimate, on-the-job training could range from \$1000 to \$5000 per trainee -- again depending upon the level of detail and sophistication of the carrier's program. The total costs for externships, i.e., a carrier completing the training that started as resident training at a school will fall in the \$3000 to \$6000 range.

4.13) Although the primary purpose of the ANPRM is to gather information on entry level truck driver training, the FHWA would like to collect some information on the training experienced drivers receive. Please describe the type and frequency of training, if any, that you offer or financially support for the more experienced CMV drivers of your company. Is this training required at certain specific intervals or provided only on an "as needed" basis?

A. The training that experienced drivers receive within motor carrier operationsthroughoutthe country varies significantly from fleet to fleet. In addition to the orientation courses that fleets provide to drivers (experienced or inexperienced)

who are new within the company, many operations offer ongoing training that provides drivers with education and training on everything from regulations to skills training. This type of training is done daily, weekly, or monthly, depending upon the nature of the operations and the frequency that drivers return to a "home terminal." There are clearly motor carrier operations that do ongoing training for experienced drivers on an as-needed basis, e.g., after an accident or a moving violation, etc. Additionally, motor carriers must now train drivers who transport hazardous materials in compliance with new DOT/RSPA regulations at least every two years or when duties change.

Hazardous Materials Issue

With regard to the applicability issue and the need to consider drivers of hazardous materials in this notice, ATA believes that the requirements of 49 CFR, Part 172.700 are sufficient in ensuring that these drivers have the requisite skills and knowledge to safely drive in intrastate or interstate commerce.

PROFESSIONAL TRUCK DRIVER
INSTITUTE OF AMERICA
HOURS OF INSTRUCTION

STUDENT HOURS :
REQUIRED INSTRUCTION **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-o	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>22.25</u> to
				<u>21.75</u>	<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