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QA18016

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FHWA Docket No. MC-93-12
Room 4233, HCC-10
Office of Chief Counsel
Federal Highway Administration
400 Seventh Street, SW
Washington, DC 20590

FHWA-97-2199-47

Dear Sirs:

Please consider this letter and the attached report as the Michigan Truck Safety Commission's response to FHWA Docket MC-93-12.

The Michigan Truck Safety Commission (MTSC) was established in 1988 by the Michigan legislature to reduce truck crashes in Michigan by promoting truck driver education and supporting enforcement of Motor Carrier regulations. The MTSC is funded by a \$15 charge added to commercial vehicle registrations.

To determine how MTSC's monies could best serve the state's trucking industry, the MTSC gave approval for a truck driver education survey to be conducted by its Truck Driver Education Subcommittee.

The subcommittee developed an extensive survey designed to reveal specific information about the industry's hiring practices, training programs (both pre-service and in-service), training needs and their experiences with truck driver training schools. A copy of the report to the MTSC by the Truck Driver Education Subcommittee is attached. The results of the survey do not necessarily express the viewpoints of the MTSC.

Following are comments from the MTSC on the need to require training of all entry level drivers of commercial motor vehicles.

On the Adequacy of Entry Level Training Provided

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

The **FHWA** Model Curriculum in conjunction with the Professional Truck Drivers Institute of **America** (PTDXA) certification program adequately addresses the proper criteria for training, Comprehensive testing of an individual driver at the conclusion of training, as well as the evaluation of work **performance**, can determine adequacy of training.

The **PTDIA** certification process for truck driver training schools can be a mechanism to measure adequacy of training. Federal funding to cover this **process** would enhance its use and make it more acceptable for schools to follow.

See Supp Info File
for Booklet of Survey
of the Michigan Trucking...

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

The Model Curriculum in conjunction with PTDXA certification appears to be an adequate standard.

- "3. 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?"

*Implementation by federal mandate of **the Model Curriculum** should be used as an adequate truck driver **training** program. The time **element** should follow the PTDIA recommended standard.*

- "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? Why are these standards appropriate?"

*The **FHWA** standard from the **Model Curriculum** should be used to determine the adequacy of entry level truck driver training.*

- "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? Please explain why or why not. Provide information on specific deficiencies."

*There are too **many** instances where schools train to **meet** the requirements of CDL. This is not sufficient. A complete **training** curriculum as outlined in the **Model Curriculum** is needed to insure a level of **proficiency**.*

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

Yes. The only way to improve the proficiency of truck drivers is to mandate entry level training of truck drivers.

Number of Drivers Trained

- "7. What is an 'entry level CMV driver'?"

Anyone who has never been licensed to drive a Commercial Motor vehicle over 10,000 pounds upon a highway.

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

*The PTDXA appears to be the only present criteria followed by select schools. This insures a standard for entry level drivers who attend those **schools**. CDL requirements have also provided a level of training required to obtain a CDL. There is little other industry initiatives to assure a level of training for entry level drivers.*

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

*At the present time there are seven active **training** schools in Michigan who train entry level drivers. It is unknown how many motor carriers conduct their own individual training.*

"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?"

Not Applicable

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

*Within the State of Michigan, the **Michigan Truck Safety Commission** has provided at no cost various training opportunities for drivers of **small** trucking companies; **i.e.**, a funded Safety Director position within the **Michigan Trucking Association**, **MTSC Mobile Training Unit** which provides on-site **training**, a Decision Driving Center, and other initiatives. **All** of these programs are intended for experienced drivers, **not entry level drivers**. All drivers enrolled have **completed** the course.*

"12. Describe the expected benefits and estimated dollar costs for the following types of training:

- a. Resident training at public and private truck driver training schools, including trade, vocational and community college programs;
- b. Home study or correspondence courses in combination with hands-on behind-the-wheel training;
- c. Training by motor carriers through:
 - Formal school setting
 - On-the-job training (i.e., learning by working with an experienced driver as a trainer); and
- d. Externships (i.e., combination truck driver training schools and motor carrier operations)."

*The benefits derived from mandated entry level training of truck drivers would be significant in reducing traffic crashes and increasing the proficiency of truck **drivers**. **Entry** level training will better prepare a driver for the experiences he/she will encounter on the highway.*

- a. *The present cost of attending a Michigan truck driver training school varies from approximately \$1,000 to \$5,000 tuition for a standard course .*
- b. *It is our understanding that home study programs are not as popular as they **were** at one time. **Experience** dictates that we do not endorse this concept of training.*

c. The extent of **training** by **motor** carrier **varies**. It appears that abbreviated **training** provided through a contract between a training school **and** a motor carrier is gaining popularity. We have grave concerns regarding this type of **training** as there appears to **be no mechanism** available to insure that proper training exists before the driver is allowed to drive on his **own**. After a training school completes a short course then the **carrier** is expected to complete the training. We question that this occurs.

Mandated training by the Model Curriculum appears to be the only way to insure that a driver has the necessary preparatory training before being allowed to drive a **Commercial Motor** Vehicle.

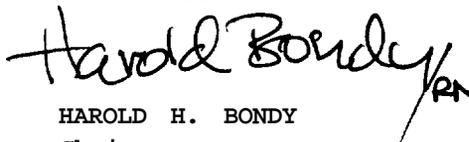
Other Than Entry Level Driver Training

"13. Although the primary purpose of this 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?"

This question is not entirely applicable to the **MTSC**, however, the **Commission** has developed and supports a variety of training programs for experienced drivers as listed in **#11** response.

Should you have any questions, or desire additional information or data, please call.

Sincerely,

Handwritten signature of Harold H. Bondy in black ink, with the initials "RN" written at the end of the signature.

HAROLD H. BONDY
Chair

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