



The Way To Go!



FHWA-97-2199-51

Shirley A. DeLibero
Executive Director

August 16, 1993

QA-8021

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

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LEGS-REGS DIV.

Dear Sirs:

NJ TRANSIT, the statewide public transportation agency of New Jersey, is pleased to have the opportunity to comment on FHWA's advance notice of proposed rulemaking on training for all entry level drivers of commercial motor vehicles. NJ TRANSIT has approximately 2,420 full time and 570 part time bus drivers and 1,200 mechanical employees, all of whom must have CDLs in order to operate vehicles. We are responding to the questions posed by FHWA that are applicable to the transit industry, although we understand that since we are a public agency, the rulemaking will not apply to us when it is issued.

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

The adequacy of training can be defined as a program that allows the student operator a sufficient amount of training time so that at the completion of training the student operator will be able to do the following in a satisfactory manner:

- Be familiar with and able to explain and comply with the Federal Motor Carrier Safety Regulations, parts 383, 390-397, and 399;
- Be able to complete a pre-trip inspection of the vehicle the student will be operating;
- Know the operating characteristics of the vehicle that will be operated;
- Be able to operate the vehicle safely in all types of traffic; and
- Be aware of the weather hazard operating characteristics of the vehicle that will be operated.

There are two mechanisms to measure the adequacy of the training -- the skills tests and the written tests the operator must take.

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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?

Either government or private standards can be used, but there must be consistency between them. Otherwise, drivers may be trained using different standards. Ultimately, either is appropriate because the training programs must conform to certain criteria or standards in order for drivers who have been trained to obtain their **CDLs**.

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?

Presently, the tests administered to demonstrate these skills are sufficient. However, in the future, as conditions change, the testing must also change. Based on the testing process that is conducted by the New Jersey Division of Motor Vehicles, as well as on our many years of training experience and the results of our efforts, we believe that our training program is sufficient and has no deficiencies. However, we are constantly looking at ways to improve our training programs, such as through the use of state-of-the-art equipment, such as simulators.

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

We see no reason for the federal government to get involved at the present time. Whether training is adequate is ultimately determined by whether the trained individuals pass the tests necessary to receive their **CDLs**. The tests themselves can be viewed as the basis for training requirements.

7. What is an "**entry** level CMV driver?"

An entry level CMV driver is one who does not have any experience operating a certain type of vehicle.

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

There are no industry-wide initiatives or policies. Policies are determined by individual companies. However, it is unlikely that an individual would pass the CDL tests without adequate training, so there is no need for any industry-wide initiative or policy.

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?

Yes, all entry level drivers must complete our training program.

13. FHWA would like to collect some information on the training experienced drivers receive.

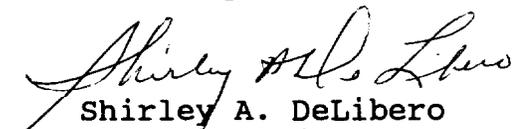
A newly hired driver who possesses a CDL receives 10 days of training before driving on regular route service as a regular driver. If we take over the operations of another bus company, the experienced drivers from that company receive three days of training in NJ TRANSIT operations and procedures.

We provide refresher training for all experienced bus operators on all aspects of the job when they have been driving for us for five years. This time frame was selected after a study by our Safety Department of when drivers started to have more accidents. Drivers who have more than one accident receive remedial training immediately after the second incident regardless of the length of time they have been driving. Defensive driving is emphasized at all times.

Our trainers also conduct on-the-job training. They ride buses on a random basis and give instructions on techniques that need improving. They also ride "undercover" if a driver has been reported as having problems to determine if the driver should go to remedial training. They ride buses in specific pre-determined areas, such as a busy urban intersection, getting on and off a series of buses to see if the drivers are following the proper procedures and driving in a safe manner. Minor infractions are corrected on the spot. More serious infractions can bring a recommendation for remedial training.

We hope this information will be useful to you.

Sincerely,


Shirley A. DeLibero
Executive Director