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Office of Chief Council
Federal Highway Administration
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Washington, D.C. 20590

FHWA-97-2199-52

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Gentlemen:

This will have reference to your request seeking comments on the need to establish federal requirements for training entry-level drivers of commercial motor vehicles (CMV).

Allow me to introduce Epes Carriers, Inc. We are a transportation holding company with four trucking subsidiaries, brokerage company and a truck driver training school. We employ over 800 employees with 1992 revenues in excess of 65 million dollars. The answers that we will provide will be from the prospective of not only an employer who hires student drivers but also a company who has funded a truck driver training school that trains students for the industry at large.

ADEQUACY OF TRAINING

1. How can the adequacy of training be defined, and what mechanisms exist to measure adequacy?

By the use of the "model curriculum for training tractor-trailer drivers" developed and distributed by the FHWA in 1985. In addition to the use of the model curriculum there needs to be a mechanism in which this curriculum is monitored and assessed.

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

In our opinion the Professional Truck Driver Institute of America (PTDIA) has the only nationally recognized standards that employ the model curriculum. Carriers will generally enhance that model with their own individual needs. Our school has been certified by the PTDIA.

3. What should an adequate truck driver training program include? What is the minimum amount of time or number of hours that should be devoted to each of these components?

We have utilized the PTDIA standards using the clock hours standards they have established in the various categories. We find that there is significant importance to include nighttime driving, backing through several types of maneuvers, entering and exiting out of a truck, mountain driving, and utilizing a variety of equipment (i.e. flatbeds, vans, tankers, refrigerated equipment, doubles). Our school has enhanced the PTDIA program by including the defensive driver training for professional truck drivers as developed by the National Safety Council which is an 8 hour course. We have also enhanced the PTDIA standards in the area of hazardous materials handling.

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 such standards appropriate?

We feel that the "model curriculum" developed by the FHWA and incorporated in the program developed by PTDIA is an excellent standard to be used in determining the adequacy of entry-level driver training. We feel these standards are appropriate since these are standards that have been developed by the industry. However, we do question any standard that says that you need 600 hours to train an entry-level tractor-trailer driver and also any standard that would be developed solely by those who are not in a position to actually hire drivers and/or student trainees.

5. To obtain a CDL, a driver must demonstrate knowledge or skills necessary to operate a CMV. Are these tests sufficiently comprehensive to accurately measure a drivers performance? If not, comment specifically on the deficiencies.

Since the CDL is a licensing requirement and not a training requirement, we feel that by itself falls short of measuring a drivers performance. We feel it is not able to deal with the fact of whether a driver can deal with the many exceptions they encounter and also know how to handle emergencies.

We have seen incidences where a driver with a CDL and no recent training has applied for a trainee position and inquiry indicates that the knowledge they have was adequate to pass the CDL test but not deep enough to do the job we require of our drivers.

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

We don't think so. We feel that the standards set up under the PTDIA criteria with enhancements created by each fleet that employ student drivers, should be the forum for training requirements.

NUMBER OF DRIVERS TRAINED

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

In our organization we define this as a student who has graduated from an approved truck driver training school, using training standards similar to the PTDIA, with a grade exceeding 80%.

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

The hiring from an approved truck driver training school that utilizes a training format, like that developed by PTDIA, and the fact that the student has a CDL license with all endorsements.

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

We can only answer based upon the fact that we are on the mailing list for PTDIA and have knowledge of schools that have met their criteria and continue to meet it on an audited basis. Their records I'm sure would reflect the percentages of completion ratios.

In our school, 80% successfully complete our course and are ready to be hired by a carrier that has an in-house driver training function to complete training.

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

We have one trucking subsidiary, Thomas Transport System, that hires student drivers. To qualify as a student driver they must have completed a training program at an approved tractor-trailer driver training school. Once hired they would remain with a CDT in a controlled environment for 6 West Coast turns or 90 days, whichever is longer.

II. Describe the training opportunities available to drivers of smaller trucking companies and owner operators. What percentage of those enrolled successfully complete such training ?

In our case we have a truck driver training school, Carolina Training Center, that recruits students into a 4-week training course and prepares a student to become an entry-level CMV driver for several companies that recruit out of that school. A very stringent qualifying procedure is exercised when interviewing the prospective student for enrollment in our school. This qualification goes well

beyond their ability to handle the training from a financial standpoint. It is extremely important that this person understand what it is to be a professional driver and during the interview we will request that the family of that student be involved in the interview so everyone understands the commitment needed on the part of the student. Upon graduation, these students are hired by those fleets that have a certified driver trainer that performs a driver finisher program.

ENTRY-LEVEL DRIVER TRAINING COST/BENEFITS

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.

Although we are not knowledgeable of the actual cost, we know that in the North Carolina area the public schools generally charge less than \$500. The private schools will charge up to \$5,000. The difference between the two is the fact that public funds are available to the public schools and the private schools generally do not have the availability of those funds under their existing programs.

- b. Home study or correspondence courses in combination with hands-on-behind-the-wheel training.

Our company would not participate in this type of program as we feel the classroom dialog and observation by the instructor is important in conjunction with the behind the wheel training.

- c. Training by motor carriers through a formal school setting and on the job training.

We have elected to establish a separate subsidiary especially for the purpose of training tractor-trailer drivers and then recruit the students from that school environment. To ensure the success of placing those students we would make them available to the motor carrier industry at-large. The acceptance of our program has been well received from a wide range of carriers ensuring placement of all students.

ENTRY-LEVEL DRIVER TRAINING COST/BENEFITS (continued)

d. Externships

We have not participated in any such programs nor seen the need to at this point. We see many pitfalls in this type of program (i.e. selection, placement).

OTHER CONSIDERATIONS

13. Describe the type and frequency of training, if any, that you offer or financially-support for the more experienced CMV drivers in your company. Is this training required at certain specific intervals or provided only as an "as needed" basis ?

All of our motor carrier fleets provide defensive driving training for professional truck drivers either through the program developed by the National Safety Council or The Smith System. This program is presented to all new hires and presented to the existing drivers on a priority based on having experienced an accident, driving record problems or dispatch availability. We present hazardous material training on a bi-annual basis, employee assistance program on drug and alcohol awareness on an annual basis, safety meetings on a periodic basis covering timely topics experienced by each fleet. Every driver at the point of hire is given an extensive orientation covering 2-3 days which explains company policy and procedures and provides training in several key areas.

We appreciate the opportunity to respond to your request for comments and hope that the information we have provided gives you some insight from a company that hires drivers and also has a separate subsidiary that trains them.

If you desire any additional information or clarification of the points presented, please feel free to contact me.

Sincerely,



Tom Thompson
Vice President Safety and Personnel

TT/vc

FHWA DOCKET MC-93-12-52
PAGE 5 OF 5