

GROWMARK

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

RE: Comments on **ANPRM** for Training for All **Entry** Level Drivers of Commercial **Motor** Vehicles (**CMVs**)

GROWMARK, Inc. is a regional agricultural supply and grain marketing cooperative operating in Illinois, Iowa and Wisconsin. In this tri-state area, we represent 91 FS retail farm supply cooperatives with over 900 facilities. Our corporate office is located at 1701 Towanda Avenue in Bloomington, Illinois.

The GROWMARK System of FS member companies supplies the farmers of Illinois, Iowa and Wisconsin with agrichemicals, petroleum products, seed, feed, structures, farm equipment and animal health products. On behalf of the FS companies and the 250,000 farmers they serve, we would like to comment on the Advance Notice of Proposed Rulemaking for the training of all entry level drivers of CMVs.

In our comments, we have addressed only those questions that relate to GROWMARK System transportation operations.

The Adequacy of Training Provided

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

GROWMARK believes that adequate training depends on the past experience of a driver and the thoroughness of the training that the driver receives initially and on an on-going basis. We hire drivers based on their level of experience with hauling farm-related products such as fuels, crop protection chemicals, anhydrous ammonia, fertilizers and grain. The adequacy of the training we provide to these drivers is defined each and every day by the number of successful and safe trips that our drivers make.

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Adequacy of Training Provided. Question #1 cont.

The current government training requirements such as the USDOT's all-inclusive HM-126 rule as well as OSHA's Hazard Communication Standard go far in ensuring that adequate training exists. Combined with private industry training, we see no need for additional mandated programs.

We also feel that the outstanding safety record of our company (or other companies, for that matter) is an excellent way to measure the success of driver training programs. During our last fiscal year, the GROWMARK System made approximately 419,874 shipments of hazardous materials covering over 6,000,000 miles. In our 65 years of operation, GROWMARK transport vehicles have traveled hundreds of millions of miles, and we have a safety record that is a source of great pride to our company.

3. What is the **minimum** amount of time that should be devoted to training?

Training should never be based on a time scale, but instead on the thoroughness of the training, the level of driver comfort, the overall knowledge gained by the driver and the commitment of the company to ensure that drivers receive on-going training.

4. Can the **government** or private standards that guide the training of entry level drivers be used to determine the adequacy of entry level training?

We do not feel that it is the government's role to adopt training standards for drivers. Private standards must remain the focal point of training, particularly since company training programs focus more on the specific products being transported by that company. At GROWMARK, ensuring that we have thoroughly trained drivers is not a luxury--it's good business sense and a necessity in today's strict regulatory arena.

5. Are the CDL tests sufficiently comprehensive to accurately measure a driver's performance?

Yes. When combined with other training programs (both federal and private) the CDL program is an extremely effective training tool. While it is true that the CDL is a just a "license", it does take a considerable amount of knowledge to successfully acquire a CDL. This is especially true if a driver seeks to obtain the hazardous material endorsement, which most of the GROWMARK System drivers are required to hold.

We believe that the knowledge required to obtain a CDL should be considered as "training" since the drivers must obviously study and comprehend the vital information required to pass the CDL exam, and then must apply this information on the job.

Adequacy of Traininu Provided. cont.

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

No. Each company should be able to train their own drivers in the manner and methods they deem appropriate. The FHWA must recognize that having thoroughly trained and experienced drivers is the foundation of any transportation company's success. why mandate something that is already being done successfully by so many companies?

Number of Drivers Trained

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. Upon hiring drivers, we enroll them in a 1-2 week company training program that focuses on the products they will be hauling as well as on federal and state transportation laws, safety and defensive driving, hazardous materials regulations, accidents and reporting, emergency response, first aid, fire protection, etc. All of this information is outlined in the GROWMARK Driver's Manual, a comprehensive training tool that each driver receives and carries with them.

Other Than Entry Level Driver Trainincr, Question #13

Our drivers receive yearly training on subjects such as hazardous materials transportation (HM-126), emergency response, federal motor carrier safety standards, hazard communication and other safety-related programs offered continually by GROWMARK. Many of these training requirements are already mandated by the government; however, GROWMARK's commitment to continual training focuses on many other subjects that we feel enhance employee skills and promote professionalism.

Costs

If the FHWA were to federally mandate entry level driver training, it would certainly increase costs in our industry for the following reasons:

1. Companies would have to follow the government's schedule upon hiring a new driver. If federal training programs are not offered nearby, we would also have to pay the employee for time off, travel to the training, overnight lodging, meals, etc. Not only does this reduce our flexibility in hiring, but could also restrict our ability to meet product demands if we are at the mercy of government scheduling.

Costs. cont.

2. Even if on-the-job training were implemented, companies would still have to pay the driver-trainer to spend time with the new driver, and may even have to pay the new drivers who might take a "home study" course.

The reality is this: Any training that is mandated by the FI-IWA will increase GROWMARK's costs because we, as a responsible motor carrier, will still train our own drivers. It would be naive to assume that a federal program (or any outside training, for that matter) would cover every facet of the transportation activities that GROWMARK is involved in each day.

In short, we want to know firsthand whether or not our drivers have received pertinent and up-to-date information concerning the operation of our vehicles, the routes we take, the products we carry and the emergency response procedures that we employ. Only by conducting our own training given by persons with first-hand experience of our products will we know that our drivers have received the best information available to them.

Like many in the transportation industry, GROWMARK, Inc. is committed to conducting driver training. Whether or not our drivers receive additional federal training is a mute--but expensive--point.

Sincerely,

GROWMARK, Inc.



Jean Trobec
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