

QA-18025

93 AUG 15 11:03
LEGS./REGS. DIV.



Dedicated to Quality Education for Employment

1825 N. Bluemound Dr.
P.O. Box 2277
Appleton, WI 54913-2277

Telephone 414-735-5600
FAX No 414-735-2582

An Equal Opportunity Employer and Educator

August 12, 1993

FHWA D. Nop. MC-93-12
Room 4232 HCC-10
OFFICE OF CHIEF COUNSEL
FEDERAL HIGHWAY ADMINISTRATION
400 Seventh Street, S.W.
Washington, DC 20590

FHWA-97-2199-5s

The Fox Valley Technical College (FVTC) provides the following comments to 49-CFR PART 383 (Docket No. MC-93-12) RIN: 2125-ADO5 concerning the need to:

Require training of all entry-level drivers of commercial motor vehicles (CMVs)

FOREWORD

FVTC is a publicly funded college located in Appleton, Wisconsin. Truck driving is one of 55 career programs offered at the College. The program is endorsed by the Wisconsin Motor Carriers Association.

A 12-week, 552-hour truck driving curriculum is offered to prospective drivers (Appendix 1).

In addition, a one-day Decision Driving Center Workshop is conducted. It is an advanced driver training program that is one of the most unique in the nation (Appendix 2).

FVTC also provides specialized training to companies and agencies throughout the United States.

The school is also an authorized Wisconsin DOT commercial driver license test center.

RULE MAKING AND QUESTIONS FOR COMMENT

- 1. How can the adequacy of training be defined?

The adequacy of a program or course of training can be assessed by evaluating how that program complies with standards such as contained in the Federal DOT model curriculum. The assessment of training can be done by measuring competencies that have been achieved throughout a course of study. In addition, evaluating work performance in terms of safety and

See dump info file for Appendix 1 and 2

FHWA DOCKET MC-93-12-55 PAGE 3 OF 5

accident experience is an area that could be used but is in need of more research .

What mechanisms exist to measure adequacy?

The Professional Truck Drivers Institute of America (PTDIA) has a system for measuring the adequacy of training by comparing courses to establish criteria through the medium of administrative, on-site, and certification board review. There are other accrediting agencies that also evaluate programs but none of these agencies provide an in-depth look at program quality.

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

Unfortunately there hasn't been a considerable amount of research done in this area. However, some years ago an extensive effort was completed and a model curriculum was developed which has been the standard used in the industry. This model curriculum needs to be updated to reflect the technological, regulatory, and highway challenges truck drivers are facing in the 90s. In the last decade, the job of driving a tractor/trailer has become increasingly more complicated and dangerous.

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

The content of training and the minimum hours should be guided by the Federal DOT curriculum. However, from our experience in working with the trucking industry, when minimum hours are set by the government, they become maximum. Also as educators, we know that many students need additional training beyond the minimum in order to achieve the competencies set forth in the curriculum.

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

Yes, there have been standards that have been developed by PTDIA that could be used for course evaluation. However, an objective, competency-based test administered to each of the students upon completion of a program would be the best measure for evaluation. More research needs to be completed in this area.

Why are these standards appropriate?

They are appropriate because without specific criteria to direct the minimum level of entry-level training, there can be no standard. The general public, we believe, wants to be assured that there is a standard of excellence provided for every driver in today's driving environment.

5. **Are these tests sufficiently comprehensive to accurately measure driver's performance?**

Unfortunately we know of no test that has been validated that would indicate the driver's knowledge and skills. The CDL test was devised and time, money, and logistical considerations dictated the design of the test.

The present CDL test only measures a small sample of the knowledge and skills necessary to drive a CMV.

While the CDL has made some improvements in the quality of truck drivers, it is now judged by both the government and the commercial trucking industry to be an inadequate measure of a driver's skills or potential safe operation.

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

The training of truck drivers should be federally mandated. It is our experience from working with trucking companies that if it isn't federally mandated, many companies do not comply because of the extremely competitive financial environment that exists today. We strongly urge that the federal government mandate an entry-level standard that would be complied with by all trucking companies.

NUMBER OF DRIVERS TRAINED

7. What is an entry-level CMV driver?

An entry-level CMV driver is a person who has never been appropriately licensed or trained to operate a CMV.

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

The CDL license provides some assurance that some training has taken place. Significant initiatives have been made individually at vocational schools and colleges around the country to assure quality entry-level training. The only nationwide uniform initiative to ensure training of drivers is administered by PTDIA. However, it must be emphasized that only the very minimum is required by PTDIA.

9. How many truck driving schools and motor carrier programs train entry-level drivers?

There are approximately 85 publicly funded truck driving schools throughout the country and many company-operated programs. The exact number of all schools that do train drivers is very difficult to estimate.

There are many schools that have gone out of business because of unethical practices and deserve to stay out of business in the future. The quality of truck driving schools in this nation in the past, and perhaps even in the present, leaves something to be desired.

What percentage of those enrolled successfully complete such training?

We are not aware of any national statistics that are available. However, at our school at least 97 percent of the people do complete the truck driving program.

The attrition that occurs with prospective drivers usually occurs within the first year of their driving experience. The present job of a truck driver has become increasingly more difficult and less attractive. The job

description of a truck driver needs to be modified in order to improve the attrition rate and keep more responsible people in the trucking industry.

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

We are not a truck driving company but all students need to complete the competencies of our curriculum in order to graduate.

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

We are unaware of figures that would be available to answer this question.

ENTRY-LEVEL DRIVER TRAINING COST/BENEFITS

12. Describe the expected benefits and estimated dollar cost for the following types of training.

- a. Resident training at public and private truck driver training schools:

It seems to be obvious that training will prepare students to avoid crashes and be safer drivers on the road. However, much research needs to be done to document this conclusion.

I do not have nationwide figures on the cost of training but at Fox Valley Technical College the tuition is approximately \$1,300.

Although I cannot document it, I believe the quality instruction at a public college or vocational school would be significantly better and provided at a more affordable cost to the student.

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

There are few, if any, true home study programs in existence such as proliferated in the 80s. Those programs that do combine some home or independent study with residence training are probably funded by Pell grant money. They will likely be longer programs and in the higher cost range of \$5,000-\$6,000.

- c. The training of drivers through a motor carrier school usually provides more specialized training and emphasis on policies related to that particular company. I would like to highly recommend the combination of industry and public school run programs. Industries and schools can have a synergistic impact on the quality of training. If the industry wants to improve the quality of training, a marriage between a public school and the trucking industry, I believe, would be a positive step in the right direction.

I am unaware of the exact costs related to training by motor carriers. Generally, training programs by motor carriers met minimum standards. I have no facts as to the costs of on-the-job training, but if the individual is paired with an experienced, qualified driver, much learning can take place in this type of environment. However, at times

the individual is paired with a driver with attitudinal or other undesirable characteristics which can be a detriment to the training program.

d. Externships

This externship type program that is professionally conducted can be a good finishing type class after the completion of a basic truck training program. However, tasks, activities, and competencies expected of students need to be well defined and evaluated done in combination with schools.

At our school the student pays approximately \$100 for what we call a co-op experience.

13. Other Than Entry-Level Driver Training

From our observation, there is a need for a standard of training for experienced drivers. The industry generally provides no formal training for its experienced truck drivers. We feel that the industry needs a standard, and if the federal government doesn't mandate such a standard, it will not happen throughout the industry. It must be pointed out that there are some fine companies that do provide entry-level as well as training for experienced drivers. However, the vast majority of drivers are provided no formalized training while on the job.

A study conducted by the Upper Great Plains Transportation Institute suggested that 75 percent or more of the experienced drivers expressed interest in training subjects such as defensive driving safety regulations, injury prevention, accident procedures, first-aid, company strategy, equipment inspection, customer service, problem-solving skills, hazardous materials, and maintenance procedures.

We at FVTC feel that our one-day advanced driver training workshop is just one example of the type of training needed by all truck drivers on an annual basis. (See brochure on Decision Driving.)

Sincerely,



Chuck Collins, Associate Dean
Technical Division

W218A93