

COMMERCIAL VEHICLE SAFETY ALLIANCE



An Association of State, Provincial and Federal Officials
Responsible for the Administration and Enforcement of Motor
Carrier Safety Laws in the United States, Canada and Mexico.

5430 GROSVENOR LANE • SUITE 130 • BETHESDA, MD 20814 • TEL.: (301) 564-1623 • FAX: (301) 564-0588

CA/27906

FHWA-97-2759-21

October 17, 1997

Docket No. FHWA-97-2759
Docket Clerk
U.S. DOT Dockets
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

DEPARTMENT OF TRANSPORTATION
91 OCT 20 PM 4:00
DOKUMENTS DIVISION

Dear Sirs:

This is in response to the Federal Highway Administration's (FHWA) proposal to revise the requirements in 49 CFR 391.11(b)(2) of the Federal Motor Carrier Safety Regulations (FMCSRs) that drivers of commercial motor vehicles operated in interstate commerce be able to read and speak the English language sufficiently to converse with the general public, understand highway traffic signs and signals, respond to official inquiries, and make entries on reports and records.

The Commercial Vehicle Safety Alliance (CVSA) is an international safety organization representing highway safety enforcement agencies in the United States, Canada and Mexico dedicated to reducing commercial motor vehicle involvement in highway crashes. The purpose of the CVSA is to promote and encourage the maintenance and operation of commercial motor vehicles in a manner that safeguards and protects the health and safety of the general public. The CVSA membership believes that this purpose is best served by increased state/provincial presence supported by an aggressive, uniform roadside inspection and enforcement program.

CVSA's Bus Committee and Regulatory and Legal Affairs Committee recently recommended specific language to be incorporated into any revision by FHWA of Section 391.11(b)(2). The Alliance's Executive Committee approved those recommendations.

2 jps

Docket No. FHWA-97-2759
October 17, 1997
Page 2

Generally, the suggested language approved by the CVSA Executive Committee follows the resolution passed by Working Group One of the Land Transportation Standards Subcommittee established by the North American Free Trade Agreement (NAFTA) in June, 1995. That resolution reads as follows:

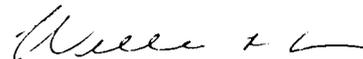
“That in recognition of the three countries’ language differences, it is the responsibility of the driver and the motor carrier to be able to communicate in the country in which the driver/carrier is operating so that safety is not compromised.”

CVSA believes that the above language, coupled with appropriate performance-oriented standards based on tasks a driver is expected to perform which require knowledge of the English language, will be sufficient to ensure safe highways in the U.S.

CVSA is not in possession of specific information which would be useful to FHWA in answering the five (5) questions posed in the Advance Notice of Proposed Rulemaking.

We appreciate the opportunity to express CVSA’s position on this proposal. Should you need further information or have any questions, please contact us at (301) 564-1623.

Sincerely,



William R. Fiste
Executive Director