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U. S. Department of Transportation
Room PI. 401
400 Seventh Street, SW
Washington, DC 20590-0001

R.E. Docket Number FMCSA-2002-12334 -12

To whom it may concern;

I would like to make some comments concerning the proposal for a Graduated Commercial Drivers License. I am the owner of a small ready mixed concrete company in Tennessee. We currently employ 10 drivers with CDL's. Finding qualified drivers is becoming a greater challenge each year. I think that a graduated CDL would help provide more qualified drivers. As it now stands when a student graduates from high school he can not enter the commercial driving field for several years. This causes some potential drivers to go to work in other fields and never become drivers. At 18 years of age or a high school diploma a person should be able to enroll in a certified CDL program so that there is not the long wait that there is now. The GCDL requirements should include enrollment in a certified CDL program plus other restrictions. A student should also have held a regular drivers license for at least 2 years before enrollment in a CDL program. The curricula should have standards for enrollment. Before graduating to a full CDL a student should not only complete a certified program but also have 2 or 3 years of restricted commercial driving experience. This experience could also be regulated in such a way as to keep new drivers off long hauls and working excessive hours. For instance in the first year a student should be restricted to local driving in smaller trucks. As a student gains experience the truck size could increase and distances increase. A student's driving record should also be considered when applying for and participating in a GCDL program. Offences such as driving under the influence and serious at fault accidents should prevent or delay a person's ability to get and hold a GCDL. Penalties for offences while holding a GCDL should be somewhat more severe than for a regular CDL.

A student should be required to have a licensed CDL driver with him for some given amount of time before being allowed to drive solo in a particular vehicle class. The student should be tested on each class of truck that the student drives before moving to a higher class of truck. After a student completes training a full CDL should be issued at the age of 21. Until that time the student could work as a CDL driver with restrictions and proper supervision.

Thank you for allowing me to give my thoughts on this matter.

Sincerely,

Carl B. Storms, President