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DEPT. OF TRANSPORTATION  
DOCKETS

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FMCSA-2002-12334-28

NAME: Randy Reynolds  
BUSINESS NAME: Brewery Products Company

ADDRESS: 1017 North Sherman St  
PHONE: 717.757.3515

DOCKET NUMBER: FMCSA-2002-12334

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**1. Please indicate your primary occupation(s) from the following list:**

- |  |   |
|--|---|
| <input type="checkbox"/> Truck Driver                                  | <input type="checkbox"/> Owner-Operator                             |
| <input type="checkbox"/> Motor Coach / Bus Driver                      | <input type="checkbox"/> Fleet Manager / Owner                      |
| <input type="checkbox"/> Company Safety Director                       | <input type="checkbox"/> Transit System Administrator               |
| <input type="checkbox"/> Commercial Driver Trainer                     | <input type="checkbox"/> Motor Carrier Insurance Provider           |
| <input type="checkbox"/> Risk Assessment Specialist                    | <input type="checkbox"/> Labor Union Representative                 |
| <input type="checkbox"/> Motor Vehicle Admin.(State Driver's Licenses) | <input type="checkbox"/> Enforcement Officer (motor carrier safety) |
| <input type="checkbox"/> Public Interest Group                         | <input checked="" type="checkbox"/> Other                           |
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**2. Do you think a graduated commercial driver's license (GCDL) is needed?**

- Yes  No
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**3. Should issuance of a GCDL be linked to enrollment in a commercial driving training program?**

- Yes  No
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**4. Should the curricula of a commercial driver training program meet widely-endorsed standards for a student to be eligible to receive a GCDL while in training?**

N/A

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**5. Approximately how many months/years of entry level training and experience should new drivers receive before "graduating" to an unrestricted CDL? Six months to year**

**6. Should an applicant's past driving record be considered in issuing a GCDL?**

Yes  No

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**7. How many of each of the following types of motor vehicle accidents and convictions within the past 12 months should cause an application to be denied a GCDL?**

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Passenger car or light truck motor vehicle accidents | <input checked="" type="checkbox"/> Other convictions for motor vehicle traffic control violations |
| <input checked="" type="checkbox"/> DUI/DWI convictions                                  | <input checked="" type="checkbox"/> Controlled substances convictions                              |
| <input checked="" type="checkbox"/> Reckless driving convictions                         | <input checked="" type="checkbox"/> Traffic violations and citations                               |
- 

**8. Should penalties for drivers holding a GCDL, who have at-fault accidents or moving violations, be more severe than those for drivers with an unrestricted CDL?**

N/A

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**9. How many months/years of passenger car or light truck driving experience should an applicant have before being issued a GCDL? After reaching the age of 18, One year**

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**10. Which of the following restrictions should apply to entry level drivers operating under a GCDL?**

- Reduced hours of service
- Limitations on equipment type (e.g., doubles/triples, tank vehicles, motor coaches, etc.)
- Limitations on weather and visibility conditions (e.g., ice, snow, fog, night driving)
- Limitations on distance or types of highways (e.g., miles per day, interstate highways, etc.)
- Other
- Limitations on types of cargo (e.g., hazardous materials, livestock, liquids, etc.)
- Limitations on geography or terrain features (e.g., mountains)

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**11. Should a fully licensed CDL driver be required to accompany and observe a driver with a GCDL? If yes, for how many weeks/months/years?**

- Yes
- No

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**12. What is the minimum age at which an applicant should be eligible to receive a graduated CDL? 18**

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**full unrestricted CDL license holder. We would rather have a pool of certified GCDL license holders eligible to deliver our product without a full unrestricted CDL which end result would save us money that could be utilized in the areas of job creation, warehouse improvements, greater retail execution and a plethora of pro-economic initiatives.**

**13. Assuming that training requirements are met, what is the minimum age at which the holder of a graduated CDL should be eligible to graduate to an unrestricted CDL? No minimum age. New CDL drivers should be required to take the minimum testing and be eligible for unrestricted CDL one year after successfully completing training.**

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**14. How much testing (knowledge and road test) should be given to GCDL holders prior to issuing an unrestricted CDL?**

- |                                     |  |                          |  |
|-------------------------------------|--|--------------------------|--|
| <input type="checkbox"/>            | Single test to "graduate" to an unrestricted CDL                 | <input type="checkbox"/> | Periodically while holding a GCDL until training is complete |
| <input checked="" type="checkbox"/> | Initial test plus re-test at 1 year after receiving initial GCDL | <input type="checkbox"/> | Other  |
- 

**15. What other factors do you feel must be addressed in the implementation of a graduated CDL program?**

Only minimum requirements for a GCDL should be considered. Most wholesalers have territories requiring only local, city and community deliveries with a same day return. Requiring our drivers to have an unrestricted CDL has limited our available driver pool and thus restricts our hiring capabilities. I urge the DOT to consider implementing a system of graduating licensing in which each level of the GCDL can be considered a CDL in its entirety and need not necessarily be considered only a stepping stone to the unrestricted CDL.

If A GCDL holder decides he wants to become an unrestricted CDL holder he should then be required to make the investment enroll and complete the additional training needed to receive the unrestricted CDL license.

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**16. What costs would you or your organization anticipate incurring if a GCDL program is implemented? To avoid the cost of training and then losing a**