

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

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

N/A

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

Yes

No

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?

Passenger car or light truck motor vehicle accidents

Other convictions for motor vehicle traffic control violations

DUI/DWI convictions

Controlled substances convictions

Reckless driving convictions

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

9. How many months/years of passenger car or light truck driving experience should an applicant have before being issued a GCDL?

2 years

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)

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

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

16 years

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?

18 years.

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

- Single test to "graduate" to an unrestricted CDL
- Periodically while holding a GCDL until training is complete
- Initial test plus re-test at 1 year after receiving initial GCDL
- Other

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

I urge the DOT to consider implementing a system of graduated 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.

16. What costs would you or your organization anticipate incurring if a GCDL program is implemented?

Savings could then be used for greater job creation, warehouse improvement, greater retail execution and a host of other pro-growth economic initiatives.

