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# Kent Beverage Company Inc.

DEPT. OF TRANSPORTATION  
DOCKETS

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NAME: Brian Gary *Tyb*

BUSINESS NAME: Kent Beverage Company, Inc.

ADDRESS: 650 36<sup>th</sup> St. SE, Grand Rapids, MI 49508

PHONE: 616-241-5022

DOCKET NUMBER: FMCSA-2002-12334 → *53*

**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 checked="" 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 type="checkbox"/> Other                                      |

**2. Do you think a graduated commercial driver's license (GCDL) is needed?**

- Yes  No

**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

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

If a GCDL holder wishes to obtain a regular CDL, he/she should only be required to pass the requirements that are in place today: that is, to pass the written test, pass the road test and pass the vehicle inspection (walk-around) test.

**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?**

- |  |  |
|--|--|
| <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?**

No or 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?

The criteria should be based on ability. The best way to judge ability is through a testing procedure and not by a measured passage of time. Additionally, if the age requirement were to be 18, the applicant should already have a couple of years experience with driving. While this may help the applicant, it is no guarantee of ability; the applicant must be tested.

## 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?

I feel that one should reach the age of 18 before being able to obtain a GCDL.



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**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 old.

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**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

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

I do not see the necessity of GCDL drivers "graduating" to a full CDL. While this should remain an option, it should not be a requirement. The small business community and beverage wholesalers in particular, face great challenges in finding and retaining qualified drivers. I believe the GCDL can be crafted with restrictions (driver age, vehicle weight, distance traveled, etc.) and greatly benefit the small business segment with their local delivery. While the GCDL could be considered a stepping stone to a full CDL, I urge the DOT to implement a program where it is not only that. The maximum benefit would be obtained if each level of GCDL is a form of a CDL in its entirety.

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

I feel that a well crafted GCDL program could be a cost savings for beverage wholesalers and small companies, especially those with local delivery needs. We already incur the cost in training our CDL drivers. While this is an anticipated and accepted cost, it really becomes a burden when these trained drivers leave us for lucrative over-the-road employment. I know that some commercial driving schools in my area charge \$4,000+ for this training while we do it as a service and as part of our employment contract. It gets very expensive when these drivers are repeatedly lured away as I must start the training process all over again with a new hire. If we could realize a cost savings from a GCDL (and I firmly believe we would), we would be able to reinvest these monies back into endeavors which create pro-growth economic initiatives.