

I think that it is great that these two companies want to subject all of their Non-DOT drivers to the same testing required by the DOT drivers, but it should not be controlled by one random pool. These companies should be able to maintain two separate random pools with little additional administrative work. For the safety of the general public, as well as their co-workers, the DOT has set standards for any employee holding a Commercial Drivers License. All DOT employees are required to be tested at a certain rate each year and by adding all the Non-DOT drivers and employees these companies have to the same random pool, I don't feel the required rate of testing will be reached or maintained.

A company can have it set up so a Non-DOT employee is tested for the same substances as the DOT employees by having the lab use a test that mirrors the DOT requirements on a Non-Federal Form. I believe these two groups of employees - separated by the type of license they hold; should remain separated when it comes to random testing. By allowing these companies the opportunity to merge these two random pools, the standards applied to the DOT drivers will be lowered.