

Having nearly 30 years of LCV introduction, innovation and implementation, I am convinced that the responsibility for putting a driver of any vehicle on the road lies solely with the carrier. Government can, by statute, dictate the character of the qualification and training, but ultimately it is the carrier that must train and make the certification. Merely pinning a name tag on an individual that has no financial or personal interest in the testing/training of a commercial truck driver is not in the best interest of the industry. The concerns that are faced by the motor carrier industry today are much different than they were 30 years ago or even 3 years ago. The insurance entities of the world have made sure that if a carrier is not in full compliance with the regulations and industry standards they will not be in business. This is an enormous incentive if not enforcement.

The Canadian government has instituted an effect certification and program for LCV drivers and instructors. Once again, it would behoove the FMCSA to consider all aspects of this program so that carriers that are already in compliance with the Canadian regulations would be in compliance with new U.S. regulations. Uniformity is a very good tool in making sure all the LCV drivers on all the highways are on the "same page". Alberta studies have shown a significant difference in the accident rate of regular semi drivers compared to the LCV drivers. That couple with the evidence in the U.S. makes a point in that the training by instructors now doing it is very good. Not that it cannot be improved, however the wheel need not be reinvented.