

the docket comments categorized by the type of commenter.

#### SUMMARY OF THE COMMENTS

Total Comments .....	1,634
In Support— .....	85
Opposition— .....	1,511
No Strong Preference— .....	38
Comments from Individual Truck Drivers .....	314
In Support— .....	29
Opposition— .....	275
No Strong Preference— .....	10
Comments from Individuals Other Than Truck Drivers .....	1233
In Support— .....	28
Opposition— .....	1,188
No Strong Preference— .....	17
Comments from Motor Carriers .....	21
In Support— .....	3
Opposition— .....	18
No Strong Preference— .....	0
Comments from Motor Carrier Associations .....	10
In Support— .....	6
Opposition— .....	2
No Strong Preference— .....	2
Comments from Insurance Companies .....	3
In Support— .....	1
Opposition— .....	2
No Strong Preference— .....	0
Comments from Insurance Associations .....	3
In Support— .....	0
Opposition— .....	3
No Strong Preference— .....	0
Comments from State Agencies .....	19
In Support— .....	7
Opposition— .....	7
No Strong Preference— .....	5
Comments from Driving Schools .....	4
In Support— .....	3
Opposition— .....	1
No Strong Preference— .....	0
Comments from Other Organizations .....	27
In Support— .....	8
Opposition— .....	15
No Strong Preference— .....	4

The most common reason given by those opposed to the younger commercial driver pilot training program was that younger drivers do not have the level of maturity or the driving experience necessary to operate a commercial motor vehicle in interstate commerce. Many of the commenters believed that individuals between the ages of 18 and 21, as a group, exercise poor judgment too frequently. To a lesser degree, those opposed to the pilot commented that the modern CMV was too complex for an individual under the age of 21 to operate. Several commenters referred to the difficulty employers of pilot drivers could expect in locating insurance companies willing to underwrite the liability insurance for these young CMV drivers.

Most of the commenters (whether in favor or in opposition to the proposal)

did not offer data in support of their position. Frequently, commenters' positions or arguments were based on media coverage (radio, television, or magazine) of the younger commercial driver pilot training program proposal, and did not discuss any specific terms of the pilot outlined in the agency's notice of February 20, 2001. Comments, such as, "I saw this program described on the news last night," or "I read about this pilot program in a [trade] magazine," were common. Many commenters did not discuss specific aspects of the TCA proposal designed to minimize the risks of the pilot program, such as, the screening of applicant-drivers, the extensive training, and the oversight and mentoring of pilot drivers by sponsoring motor carriers. Very few commenters answered any of the six questions that the agency posed in the notice. Many commenters simply stated their belief that it was unsafe to permit any individual under the age of 21 to operate a CMV under any conditions.

The comments that were supported by data came from a variety of sources, including insurance associations, safety organizations, trucking associations, trucking companies, truck driving schools, and State agencies concerned with highway safety. Most of the insurance industry organizations that responded to the notice were opposed to the pilot. Opposition in this group centered upon studies indicating that drivers under age 25 have a markedly higher crash risk than older drivers, and upon the contention that "driver training" has been shown to have little effect in reducing the crash risk. The Insurance Institute for Highway Safety stated, "[t]here is much research and it unequivocally shows that young truck drivers have markedly higher crash risks than older truck drivers."

Three safety advocacy organizations commented, and all believed that the pilot program was not designed to ensure that the requisite level of safety would be maintained if younger drivers were permitted to operate CMVs in interstate commerce. The Advocates for Highway and Automobile Safety commented:

[The proposed program] defies prevailing research findings of long standing. No studies assessing the value of young [CMV] driver training programs has demonstrated a sustained beneficial effect in the area of crash or accident rates among young drivers. In fact, the opposite can be demonstrated—higher crash and accident rates among trained youth, who may become overconfident and more likely to take risks.

Most of the national trade or trucking associations that commented were in favor of conducting a pilot program.

They believed that the level of safety required by statute for the pilot program could be maintained, and that the pilot would help with the shortage of truck drivers in the industry. The American Trucking Associations (ATA) noted that the pilot program provided preparation and training that far exceeded that which beginning CMV drivers receive today. The ATA believes that the pilot "should enhance the \* \* \* end product, a qualified driver." The joint statement of the American Automobile Association, the American Association of Motor Vehicle Administrators, the Commercial Vehicle Safety Alliance, and the National Association of Governor's Highway Safety Representatives advised caution, but stated that "the high crash rates of younger [CMV] drivers can be overcome by effective training, real-world driving experience, and mentoring."

Most of the State trucking associations that commented were also in favor of conducting a pilot program. These commenters emphasized the fact that 48 States currently allow drivers under the age of 21 to operate CMVs in intrastate commerce, and many of these allow individuals as young as 18 years of age to operate commercial motor vehicles. Several of the State trucking associations indicated that the State accident history of CMV operators under age 21 was no worse than that of older operators of CMVs.

Motor carriers who commented favorably concerning the younger driver pilot program had a favorable experience in hiring younger drivers for intrastate operations, and they were confident that the pilot safeguards were adequate to ensure highway safety. Most of the motor carriers opposed to the pilot believed that it is too risky to permit individuals under the age of 21 to operate CMVs in interstate commerce because they lack the maturity necessary to safely operate CMVs.

Among the comments received from educational institutions engaged in training truck drivers, three commenters supported the concept of a pilot program as proposed by TCA, and one opposed the program. The Commercial Vehicle Training Association, a trade group whose membership includes 34 training schools for commercial motor vehicle drivers, favored adoption of the pilot, indicating that it thought that "the standards for selection, training, and driver finishing were much more stringent than those currently in place in the industry."

Most of the State agencies that responded indicated that their States allow individuals under the age of 21 to operate CMVs in intrastate commerce.