

Comments: Twelve respondents provided comments to this question. The commenters were almost equally divided on the question whether LCV instructor certification should be accomplished by the FMCSA, rather than a motor carrier or a State, to ensure that the instructor met Federal minimum requirements. On the other hand, the commenters tended to prefer State certification of LCV drivers to certification by an LCV instructor, motor carrier, the FMCSA, or self-certification.

With regard to the certification method, the ATA suggested "LCV instructors should go through a carrier managed certification program much like the certification process for vehicle and brake inspectors. The licensing of drivers should be tied to the CDL testing process."

The AHAS expressed the opinion "that uniformity of instruction, certification, and licensure can only be accomplished by Federal Standards through state licensing agencies and must supersede voluntary standards-setting organization and their system of certification." Conversely, "UPS believes that each carrier should be held responsible for certification and recertification of their triples drivers and driver trainers. * * * As a practical matter, the expertise in LCV driver-training resides with motor carriers. We feel that Federal or State certification of LCV driver training is unworkable and unnecessary." Essentially, Yellow Freight shares the same position as UPS.

Question 6: What specific Federal, State or local agency should have the responsibility for assuring that the requirements of LCV training are met, and what form of documentation should be established to prove to prospective employers that adequate LCV training has been successfully completed by a driver? Who should be held accountable if the training requirements are not met?

Comments: This question has three distinct parts: responsibility, documentation and accountability. Thirteen respondents provided comments to this question.

Eleven commenters addressed the responsibility aspect of the question. Eight were proponents of State agencies accepting the responsibility and/or linking the training requirement to the CDL program. Three commenters recommended that the FMCSA CR process be employed to further enforce this requirement. With regard to documentation of training, five of 11 commenters were in favor of a certificate issued either by a training institution or the FMCSA. Three other commenters suggested that completion of LCV training be integrated into the

CDL process through the use of an appropriate endorsement.

Seven commenters addressed the accountability aspect of the question. Five of the commenters argued that both the motor carrier and the driver should be held accountable. The other two respondents were of the opinion that the driver alone should be held accountable for obtaining the required training.

Question 7: Should nonprofit, private organizations, such as PTDI, be authorized to evaluate and certify the adequacy of LCV training programs?

Comments: Of the fourteen commenters that responded, five opposed private organizations evaluating and certifying LCV training programs. Of these, three believed that this should be a Federal or State governmental function. Nine favored evaluation and certification by private organizations.

Question 8: What types of LCV driver-training programs exist?

Comments: Eight respondents provided comments on this question. The ATA stated that "[m]ost fleets that operate LCVs have established their own in-house training programs. These carrier-directed programs generally require certain levels of experience and excellent driving records prior to driving LCVs. Key eligibility criteria motor carriers impose upon drivers prior to [their] operating LCVs include no moving violations or accidents within a specified time frame (generally three years). Many carriers that operate LCVs also have age minimums for LCV drivers—typically age 25 as a minimum." The PTDI stated that, "[t]o our knowledge, there are no 'schools' that teach a specific LCV course." Current cost estimates to train an LCV driver range from \$400 (ATA and Yellow Freight) to \$6,445 per trainee (UPS).

Question 9: Should the implementation of minimum training requirements for LCV operators be "phased in" over a certain period of time?

Comments: Ten of the 12 respondents supported a "phased in" implementation of a minimum training requirement. The suggested "phase in" period ranged from one to four years. The ATA specifically supports the phase-in concept to give smaller motor carriers adequate time to plan and implement the program without undue financial hardship and because of the excellent safety record of the LCV segment of the industry.

The AHAS did not support the phasing-in of LCV training requirements. Instead, it "strongly favors a specific date by which all

drivers of LCVs, western doubles and other multi-unit trucks can take the CDL LCV endorsement only with state-approved certification in hand showing successful completion of an LCV training program based on FMCSA standards." The AHAS also suggested that the FMCSA require that the LCV training infrastructure (e.g., certification of instructors and training programs and oversight systems) be in place in advance of any actual driver-training. The NPTC suggested linkage of the LCV training requirements to the CDL program by the introduction of a CDL endorsement for LCVs.

Question 10: Should LCV training be a prerequisite for a double/triple trailer endorsement on a CDL?

Comments: Eleven of the 14 commenters generally supported a training prerequisite.

The SCRA argued that such a prerequisite could cause confusion since it would broaden the definition of LCV to include combination vehicles having a GVWR of less than 36,288 kilograms (80,000 pounds). Yellow Freight stated that "(t)riple trailer combinations specifically are only authorized in 16 States. It would be an enormous waste of motor carrier time and money to require triples driver-training of drivers in the other 34 States or of drivers, such as city drivers, who may never operate triples." The UPS voiced a similar opinion.

Question 11: Should all LCV drivers be required to have previous experience with single trailer vehicles?

Comments: Ten of the 13 respondents contend that an individual should have CMV experience prior to becoming an LCV driver. Eight of these 10 believe that this experience should be in single-trailer vehicles. The minimum amount of single-trailer experience that was recommended ranged from one to five years. Two years was specified most often. Only two commenters (PTDI and SCRA) disagreed with the experience requirement; they contend that if a driver has a CDL and completes the required LCV training, experience should not be a factor.

Question 12: How often should LCV training be offered/repeated for both instructors and drivers?

Comments: Thirteen commenters addressed this question. Comments ranged from the suggestion that driver training be repeated whenever new equipment is introduced into the industry (ATA and Yellow Freight), to the proposal that it be repeated only if the driver is disengaged from LCV activity for more than a year (SCRA). The Colorado DOT and the New York State Thruway Authority (NYSTA) were