

The conclusion of both the training analysis and the driver survey, using this methodology, was that neither the heavy truck, motorcoach, nor school bus segments of the CMV industry were providing adequate entry-level driver training. At the same time, the adequacy study found that the only research-based evidence on the relationship between training and accident reduction indicated that drivers with formal training are somewhat more likely to have accidents. However, the researchers concluded that the lack of uniform training standards may have masked the real effects of good training.

The adequacy study found few studies within the motor carrier industry that had examined the relationship between training and accident reduction. However, Builder's Transport, Inc., a motor carrier, did a study of 2,600 trained drivers in 1994, that showed a two percent reduction in accidents per million miles driven in contrast to drivers who had no training. Schneider National, Inc., a motor carrier, also performed a study involving its training on hazard-driving conditions, and found a 40 percent reduction in accidents. In both of these studies, drivers with training had fewer accidents.

#### *Adequacy Study Cost-Benefit Analysis*

As part of the adequacy study, the agency performed a cost-benefit analysis of training in the heavy truck industry. The analysis was limited to heavy trucks due to a scarcity of available cost data among motorcoach and school bus training programs. However, the agency believes that the findings are generally applicable to the other industries, because motor coaches and most school buses are over 11,794 kilograms (26,001 pounds), and the drivers of all three have similar responsibilities. The cost benefit analysis applied the definition of CMV contained in the CMVSA, but did not include placarded hazardous material vehicles with a GVWR less than 11,794 kilograms (26,001 pounds). The results of this earlier analysis showed a much higher cost than today's proposal, because it was based on 65.8 hours of required training. This NPRM, however, does not specify a minimum number of hours. The regulatory evaluation for this proposal is based on a total of 10½ hours of training for heavy truck and motorcoach drivers, and 4.5 hours for school bus drivers, as discussed later in this proposal.

#### *Report to Congress*

The Secretary of Transportation submitted the adequacy study entitled, *Assessing the Adequacy of Commercial*

*Motor Vehicle Driver Training: Final Report and the first Cost-Benefit analysis to the U.S. Congress on February 5, 1996, as required by the ISTEA.*

#### *Information from the ANPRM and the Public Meeting*

The agency received a total of 154 comments to the ANPRM and the public meeting. Some commenters responded more than once, and some commenters provided more than one answer to a particular question.

#### *Question 1: How Can the Adequacy of Training Be Defined? What Mechanisms Exist to Measure Adequacy?*

A total of forty-seven comments were received regarding Question 1.

*Defining Adequacy:* Sixteen commenters, including the PTDI, stated that adequacy was defined either by the PTDI tractor-trailer curriculum or the Model Curriculum referenced above. Fourteen commenters, including the National Private Truck Council, stated that either the CDL in general, or the CDL tests in particular, define adequate training. The remaining comments included statements that training adequacy is defined by a job skills analysis, or that it is defined by the Model Curriculum modified for straight trucks.

*Measuring Adequacy:* Seven commenters, including the ATA, stated that the PTDI Model Curriculum is a measurement of training adequacy. Nine commenters, including the California Department of Motor Vehicles, stated that training adequacy is measured by the CDL tests. The remaining comments included statements that training adequacy is determined by comparing accident rates of trained versus untrained drivers, or that it is determined by gaining employment as a CDL driver.

The agency believes that the Model Curriculum represents the basis for training adequacy. It is based on minimum training standards that were adopted by the agency after an analysis of heavy truck driver training being provided by the industry in the 1980's. Likewise, both the PTDI curriculum and the Model Curriculum for Training Motorcoach Drivers are adequate because they are based on the Model Curriculum. Finally, the agency believes that the NHTSA School Bus Driver Instructional Program is adequate. It was developed by school bus driver employers in conjunction with NHTSA. The school bus driver employers and NHTSA periodically meet to review the instructional program and make any necessary revisions. Moreover, all of the

above curricula were selected as training program baselines by experts in the adequacy study. They were also developed based on the regulations and technology current at the time of development. However, the agency disagrees with commenters indicating that the knowledge to pass the CDL test is sufficient to determine training adequacy.

Finally, the agency believes employers that wish to train entry-level drivers should ensure that the curriculum is suitable for the type of vehicle the driver intends to operate. For example, a modified Model Curriculum could be used to train drivers who operate straight trucks exclusively.

#### *Question 2: What Standards Exist to Ensure That Training Provided by Schools and Employers Is Adequate for Entry-Level Truck Driver Training?*

A total of forty-three commenters responded to this question. Thirteen commenters, including the Owner-Operator Independent Drivers Association, cited either the PTDI organization or the PTDI certification process, as a standard to ensure that training provided by schools is adequate. Again, eight commenters, including the American Bus Association, cited the CDL tests. The remaining comments cited the Model Curriculum as an adequate training standard, or stated that no standard exists.

The discussion to Question 1 also contains relevant information on the adequacy of driver training. In addition, the agency agrees with commenters that although the CDL requirements are a licensing standard and not a training standard, the driver must study to pass the CDL tests.

#### *Question 3: What Should an Adequate Truck Driver Training Program Include (e.g. Night Driving, Behind-the-Wheel Training, and Classroom Instruction)? What Is the Minimum Amount of Time or Number of Hours That Should Be Devoted to Each of These Components?*

A total of seventy-one commenters addressed this question.

Eight commenters, including the ATA, stated that the training should be the PTDI curriculum for both course content and length. Three commenters, including the American Bakers Association, cited the Model Curriculum as the standard for both course content and length. The remaining comments recommend specific topics for classroom, off-road maneuvers, or on-road driving, which included down hill speed control for