

training costs are the number of drivers who will need training and the hours of training they will have to undertake.

The FMCSA estimates that the proposed rule would require 10.5 hours of training of the entry-level drivers of heavy trucks in the proposed four subject areas. The two content areas of driver qualifications and hours of service together would require about 6 hours of training. The driver wellness training would also require about 4 hours, while training on whistle blower protection is estimated at 30 minutes. However, the FMCSA believes that the entry-level drivers of school buses would only require 4.5 hours of training, comprised of 4 hours of driver wellness instruction and 30 minutes of whistle blower protection training (given that the Federal driver qualifications and hours-of-service content would not apply). The FMCSA also estimates that the proposed rule would require 10.5 hours of training of the entry-level drivers of motorcoaches. The training hours estimate for heavy truck drivers was based on information provided in the instructor's guide for the Professional Truck Drivers Institute's (PTDI) accredited training courses and discussions held with FMCSA CDL Program staff. The training hours estimate for motor coach drivers was estimated using the instructor's guide for the Model Curriculum for motor coach drivers and discussions with FMCSA CDL Program staff.

Using data from the Bureau of Labor Statistics, the total number of entry-level truck drivers is estimated at 58,600 per year for the next 10 years, while the entry-level drivers required for growth and replacement for the school bus and motorcoach industry are estimated at 17,800 and 2,100 per year, respectively, also over the next 10 years.

In this analysis, we assumed that 30 percent of the entry-level heavy truck drivers, or 17,580, would not need any additional training, as they are assumed to attend a PTDI or similar accredited training program (*i.e.*, PTDI accredited courses already include these content areas in their curriculum). This assumption is based on information obtained regarding the number of accredited programs as a percent of total driver training programs. For the remaining 70 percent (or 41,020, entry-level drivers), we assumed that they either receive training from a non-accredited training program or they receive informal training from their employer. Therefore, this 70 percent of entry-level drivers would require 10.5 hours of training per driver on the four subject areas mentioned above. Therefore, the total hours of training

required by the proposed rule for the entry-level heavy truck drivers is estimated at 430,710 hours per year. For those drivers who already receive some type of formal (yet non-accredited) employer-or third-party training, it is quite possible that employers (or third-party training providers) might reduce the amount of training time spent on other, non-required subject matter, so that the net increase in training per truck driver would be less than 10.5 hours. However, in the absence of specific information on the types of subject matter than might be omitted from these driver training programs to offset the new training costs, we assumed a net increase of 10.5 hours for estimating the costs of this rule.

Regarding school bus driver training, neither the Federal driver qualifications nor the Federal Hours of Service rules are applicable to these drivers. Therefore, this entry-level training rulemaking will result in only 4.5 hours of additional training for each entry-level driver, since these training programs would include primarily driver wellness (4 hours) as well as whistle blower protection (0.5 hours). States have long required school bus drivers to take written exams designated to test an entry-level driver's knowledge of state laws and regulations affecting school transportation. Additionally, behind-the-wheel road tests are used to evaluate an applicant's driving skills. For example, as a comment to the ANPRM, the Texas Department of Public Safety stated that Texas requires classroom and behind-the-wheel training totaling 20 hours. In our review of the school bus driver training information, we concluded that no districts were providing instruction in driver wellness and whistle blower protection, since the NHTSA voluntary training standard, known as the School Bus Driver Training Program, did not include such content. Therefore, FMCSA estimates that all 17,800 entry-level school bus drivers would need an additional 4.5 hours of training for a total of 80,100 hours of training per year.

FMCSA assumes that the additional hours of training for an entry-level motorcoach driver would be 10.5 hours. The instructor's guide to the model curriculum for training motor coach drivers includes 5 hours of logbook training but only about an hour on safety and wellness issues (including topics such as the correct lifting of heavy objects and identifying prohibited cargo). The FMCSA does not have information on the proportion of entry-level motorcoach drivers following training as per the model curriculum.

Therefore, the FMCSA estimates that 2,100 entry-level drivers of motorcoaches would require 10.5 hours of training on driver qualifications, hours of service for drivers, driver wellness and whistle blower protection for a total of 22,050 hours of training per year.

To be conservative, a figure of \$25 per hour of training was used in this analysis to calculate the direct costs of training (calculated via an average cost of \$4,000 per training course divided by 4 weeks divided by 40 hours per week). This translates into \$262.50 of direct training costs for a 10.5-hour course and \$112.50 for 4.5-hour course. The agency believes that this was a reasonable estimate of the total hourly cost to train drivers (whether or not the training is provided by the employer or a third party) because it falls well within the range of training cost estimates provided in comments to the ANPRM. In reality, employer-based training could very well be less than \$25/hour in certain cases (*i.e.*, assuming new physical space is not leased by the employer to conduct the training, or the training is self-directed by the driver), but to be conservative the agency used the same figure whether the training was employer-or third party-based so as to ensure not underestimating employer and/or driver costs.

To arrive at a truck driver's wage rate, we use a figure of \$14.75 per hour, which is an average from three recent national wage/employment surveys (including the Current Population Survey). We added 31 percent to cover the cost of fringe benefits, an estimate developed in the Hours of Service regulatory evaluation. (It is a weighted average of the fringe benefits for private and for-hire carriers, based on data from the ATA and the BLS.) The 31 percent increase brings total compensation to \$19.32.

Regarding a school bus driver's wage, we use a figure of \$7.67 per hour obtained from the BLS 2001 National Occupational Employment and Wage survey. This figure represents the 25th percentile wage estimate for an entry-level school bus driver and we used it because entry-level drivers generally earn at the low range of the industry wage standards. Again, 31 percent is added to cover the cost of fringe benefits, resulting in a total hourly wage estimate of \$10.05 per hour.

Regarding a motorcoach driver's wage, we use a figure of \$9.98 per hour obtained from the BLS 2001 National Occupational Employment and Wage survey. This figure represents the 25th percentile wage estimate for an entry-level motorcoach driver and we used it